

APCD RECORDS

ACTION			
11-6-08	CTOI	GR-1	Preserve Class I Hh
11-6-08	GR-1		Accept I, R441 Permit.
11-12-08	GR-1	AD-1	R441 PC-PO Reconn.
2-19-08	AD-1	CTOI	Approve R441 Hh

REFERENCE TO OTHER APCD RECORDS INCLUDING VARIANCES

G1549

(3014)

APPL # 491468  
I.D. # 17301

ORANGE COUNTY SANITATION DISTRICT  
10844 ELLIS AVE  
FOUNTAIN VALLEY  
FUEL CELL ENERGY STN

Date: 10/30/08



South Coast Air Quality Management District

# Form 400-A

## Application For Permit To Construct and Permit To Operate

Mail Application To:  
P.O. Box 4944  
Diamond Bar, CA 91765

Tel: (909) 396-3385  
www.aqmd.gov

### Section A: Operator Information

1. Business Name of Operator To Appear On The Permit:  
Orange County Sanitation District

2. Valid AQMD Facility ID (Available on Permit or Invoice issued by AQMD):  
017301

3. Owner's Business Name (only if different from Business Name of Operator):

### Section B: Equipment Location

4. Equipment Location Address:  
For equipment operated at various locations in AQMD's jurisdiction, provide address of initial site

10844 Ellis Avenue  
Street Address  
Fountain Valley CA 92708 7018  
City State Zip Code

County: ☐ Los Angeles ☒ Orange ☐ San Bernardino ☐ Riverside

Contact Name: Terry Ahn

Contact Title: Regulatory Specialist Phone: (714) 593-7082

Fax: (714) 962-8379 E-Mail: vkogan@ocsd.com

### Section C: Permit Mailing Address

5. Permit and Correspondence Information:

☒ Check here if same as equipment location address

Street Address  
City State Zip Code

Contact Name:

Contact Title: Phone:

Fax: E-Mail:

### Section D: Application Type

The facility is in ☐ RECLAIM ☐ Title V ☐ RECLAIM & Title V Program (please check if applicable)

6. Reason for Submitting Application (Select only ONE):

- ☒ New Construction (Permit to Construct)
- ☐ Equipment Operating Without A Permit or Expired Permit\*
- ☐ Administrative Change
- ☐ Equipment On-Site But Not Constructed or Operational
- ☐ Title V Application (Initial, Revisions, Modifications, etc.)
- ☐ Compliance Plan
- ☐ Facility Permit Amendment
- ☐ Registration/Certification
- ☐ Streamlined Standard Permit

- ☐ Permitted Equipment Altered/ Modified Without Permit Approval\*
- ☐ Proposed Alteration/Modification to Permitted Equipment
- ☐ Change of Condition For Permit To Operate
- ☐ Change of Condition For Permit To Construct
- ☐ Change of Location—Moving to New Site

Existing Or Previous Permit/Application Number:  
(if you checked any of the items in this column, you MUST provide a existing Permit/ Application Number)

\* A Higher Permit Processing Fee applies to those items with an asterisk (Rule 301 (c) (1) (D))

7. Estimated Start Date of Operation/Construction (MM/DD/YYYY):  
03/31/2009

8. Description of Equipment:  
Temporary Fuel Cell Energy Station Consisting of Fuel Pretreatment Skid; FuelCell Energy Direct Fuel Cell Model DFC300MA; and Hydrogen Recovery Unit

9. Is this equipment portable AND will it be operated at different locations within AQMD's jurisdiction? ☒ No ☐ Yes

10. For identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each)

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are \$500,000 or less, or a not-for-profit training center?) ☒ No ☐ Yes

12. Has a Notice of Violation (NOV) or a Notice To Comply (NC) been issued for this equipment? ☒ No ☐ Yes If yes, provide NOV/NC #:

### Section E: Facility Business Information

13. What type of business is being conducted at this equipment location?  
Municipal Wastewater Treatment

14. What is your businesses primary NAICS Code (North American Industrial Classification System)?  
221320

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? ☐ No ☒ Yes

16. Are there any schools (K-12) within a 1000-ft. radius of the equipment physical location? ☒ No ☐ Yes

### Section F: Authorization/Signature I hereby certify that all information contained herein and information submitted with this application is true and correct.

17. Signature of Responsible Official:  
*Mike D. Moore*

18. Title:  
Manager, ECR

19. Print Name:  
Mike D. Moore

20. Date:  
10/24/08

- Check List
- ☐ Form(s) signed and dated by authorized official
  - ☐ Supplemental Equipment Form (400-E-XX or 400-E-GEN)
  - ☐ CEQA Form (400-CEQA) attached
  - ☐ Payment for permit processing fee attached

Your application will be rejected if any of the above items are missing.

AQMD USE ONLY	APPLICATION/TRACKING # 491468	TYPE B C D	EQUIPMENT CATEGORY CODE: 999993	FEE SCHEDULE \$4867.37	VALIDATION 10/30/08
ENG. DATE 11-6-08	ENG. DATE	CLASS I III IV	ASSIGNMENT Unit: Engineer	CHECK/MONEY ORDER 1000015703	AMOUNT \$4867.37

(75630)

R301 XPP

\* PO Box is OK  
all ltr. dated 10/23

S.C.A.O.M.D.  
ENGINEERING

'08 OCT 30 P4:24



South Coast Air Quality Management District

## Form 400-CEQA

### California Environmental Quality Act (CEQA) Applicability

Mail Application To:  
P.O. Box 4944  
Diamond Bar, CA 91765

Tel. (909) 396-3385

[www.aqmd.gov](http://www.aqmd.gov)

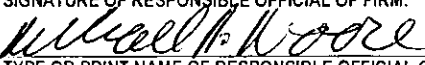
The SCAQMD is required by state law, the California Environmental Quality Act (CEQA), to review discretionary permit project applications for potential air quality and other environmental impacts. This form is a screening tool to assist the SCAQMD in clarifying whether or not the project<sup>1</sup> has the potential to generate significant adverse environmental impacts that might require preparation of a CEQA document [CEQA Guidelines §15060(a)].<sup>2</sup> Refer to the attached instructions for guidance in completing this form.<sup>3</sup> For each Form 400-A application, also complete and submit one Form 400-CEQA. If submitting multiple Form 400-A applications for the same project at the same time, only one 400-CEQA form is necessary for the entire project. If you need assistance completing this form, contact Lori Inga at (909) 396-3109.

FACILITY INFORMATION			
Business Name of Operator to Appear on the Permit: Orange County Sanitation District		Facility ID (6-Digit): 017301	
Project Description: Installation of Temporary 300KW Fuel Cell Energy Station with Hydrogen Recovery Unit			
REVIEW FOR EXEMPTION FROM FURTHER CEQA ACTION			
Check "Yes" or "No" as applicable			
	Yes	No	Is this application for:
A.	<input checked="" type="radio"/>	<input type="radio"/>	A CEQA and/or NEPA document previously or currently prepared that specifically evaluates this project? If yes, a permit cannot be issued until a Final CEQA document and Notice of Determination is submitted.
B.	<input type="radio"/>	<input checked="" type="radio"/>	A request for a change of permittee only (without equipment modifications)?
C.	<input type="radio"/>	<input checked="" type="radio"/>	Equipment certification or equipment registration (qualifies for Rule 222)?
D.	<input type="radio"/>	<input checked="" type="radio"/>	A functionally identical permit unit replacement with no increase in rating or emissions?
E.	<input type="radio"/>	<input checked="" type="radio"/>	A change of daily VOC permit limit to a monthly VOC permit limit?
F.	<input type="radio"/>	<input checked="" type="radio"/>	Equipment damaged as a result of a disaster during state of emergency?
G.	<input type="radio"/>	<input checked="" type="radio"/>	A Title V (i.e., Regulation XXX) permit renewal (without equipment modifications)?
H.	<input type="radio"/>	<input checked="" type="radio"/>	A Title V administrative permit revision?
I.	<input type="radio"/>	<input checked="" type="radio"/>	The conversion of an existing permit into an initial Title V permit?
If "Yes" is checked for any question above, your application does not require additional evaluation for CEQA applicability. Skip to page 2, "SIGNATURES" and sign and date this form.			
REVIEW OF IMPACTS WHICH MAY TRIGGER CEQA			
Complete Sections I-VI by checking "Yes" or "No" as applicable. To avoid delays in processing your application(s), explain all "Yes" responses on a separate sheet and attach it to this form.			
	Yes	No	Section I – General
1.	<input type="radio"/>	<input type="radio"/>	Has this project generated any known public controversy regarding potential adverse impacts that may be generated by the project? Controversy may be construed as concerns raised by local groups at public meetings; adverse media attention such as negative articles in newspapers or other periodical publications, local news programs, environmental justice issues, etc.
2.	<input type="radio"/>	<input type="radio"/>	Is this project part of a larger project?
Section II – Air Quality			
3.	<input type="radio"/>	<input type="radio"/>	Will there be any demolition, excavating, and/or grading construction activities that encompass an area exceeding 20,000 square feet?
4.	<input type="radio"/>	<input type="radio"/>	Does this project include the open outdoor storage of dry bulk solid materials that could generate dust? If Yes, include a plot plan with the application package.

<sup>1</sup> A "project" means the whole of an action which has a potential for resulting in physical change to the environment, including construction activities, clearing or grading of land, improvements to existing structures, and activities or equipment involving the issuance of a permit. For example, a project might include installation of a new, or modification of an existing internal combustion engine, dry-cleaning facility, boiler, gas turbine, spray coating booth, solvent cleaning tank, etc.

<sup>2</sup> To download the CEQA guidelines, visit [http://ceres.ca.gov/env\\_law/state.html](http://ceres.ca.gov/env_law/state.html).

<sup>3</sup> To download this form and the instructions, visit <http://www.aqmd.gov/ceqa> or <http://www.aqmd.gov/permit>

	Yes	No	
5.	<input type="radio"/>	<input type="radio"/>	<b>Would this project result in noticeable off-site odors from activities that may not be subject to SCAQMD permit requirements?</b> For example, compost materials or other types of greenwaste (i.e., lawn clippings, tree trimmings, etc.) have the potential to generate odor complaints subject to Rule 402 – Nuisance.
6.	<input type="radio"/>	<input type="radio"/>	<b>Does this project cause an increase of emissions from marine vessels, trains and/or airplanes?</b>
7.	<input type="radio"/>	<input type="radio"/>	<b>Will the proposed project increase the QUANTITY of hazardous materials stored aboveground onsite or transported by mobile vehicle to or from the site by greater than or equal to the amounts associated with each compound on the attached Table 1?<sup>4</sup></b>
<b>Section III – Water Resources</b>			
8.	<input type="radio"/>	<input type="radio"/>	<b>Will the project increase demand for water at the facility by more than 5,000,000 gallons per day?</b> The following examples identify some, but not all, types of projects that may result in a "yes" answer to this question: 1) projects that generate steam; 2) projects that use water as part of the air pollution control equipment; 3) projects that require water as part of the production process; 4) projects that require new or expansion of existing sewage treatment facilities; 5) projects where water demand exceeds the capacity of the local water purveyor to supply sufficient water for the project; and 6) projects that require new or expansion of existing water supply facilities.
9.	<input type="radio"/>	<input type="radio"/>	<b>Will the project require construction of new water conveyance infrastructure?</b> Examples of such projects are when water demands exceed the capacity of the local water purveyor to supply sufficient water for the project, or require new or modified sewage treatment facilities such that the project requires new water lines, sewage lines, sewage hook-ups, etc.
<b>Section IV – Transportation/Circulation</b>			
10.	<input type="radio"/>	<input type="radio"/>	<b>Will the project result in (Check all that apply):</b> a. the need for more than 350 new employees? b. an increase in heavy-duty transport truck traffic to and/or from the facility by more than 350 truck round-trips per day? c. increase customer traffic by more than 700 visits per day?
<b>Section V – Noise</b>			
11.	<input type="radio"/>	<input type="radio"/>	<b>Will the project include equipment that will generate noise GREATER THAN 90 decibels (dB) at the property line?</b>
<b>Section VI – Public Services</b>			
12.	<input type="radio"/>	<input type="radio"/>	<b>Will the project create a permanent need for new or additional public services in any of the following areas (Check all that apply):</b> a. Solid waste disposal? Check "No" if the projected potential amount of wastes generated by the project is less than five tons per day. b. Hazardous waste disposal? Check "No" if the projected potential amount of hazardous wastes generated by the project is less than 42 cubic yards per day (or equivalent in pounds).
<b>**REMINDER: For each "Yes" checked in the sections above, attach all pertinent information including but not limited to estimated quantities, volumes, weights, etc.**</b>			
<b>SIGNATURES</b>			
I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE. I UNDERSTAND THAT THIS FORM IS A SCREENING TOOL AND THAT THE SCAQMD RESERVES THE RIGHT TO CONSIDER OTHER PERTINENT INFORMATION IN DETERMINING CEQA APPLICABILITY.			
SIGNATURE OF RESPONSIBLE OFFICIAL OF FIRM:		TITLE OF RESPONSIBLE OFFICIAL OF FIRM:	
		Manager, ECRA	
TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL OF FIRM:		RESPONSIBLE OFFICIAL'S TELEPHONE NUMBER:	DATE Signed:
Mike D. Moore		(714) 5937-450	
SIGNATURE OF PREPARER, IF PREPARED BY PERSON OTHER THAN RESPONSIBLE OFFICIAL OF FIRM:		TITLE OF PREPARER:	
		Regulatory Specialist	
TYPE OR PRINT NAME OF PREPARER:		PREPARER'S TELEPHONE NUMBER:	DATE Signed:
Terry Ahn		(714) 5937-082	10/23/08

THIS CONCLUDES FORM 400-CEQA. INCLUDE THIS FORM AND THE ATTACHMENTS WITH FORM 400-A.

<sup>4</sup> Table 1 – Regulated Substances List and Threshold Quantities for Accidental Release Prevention can be found in the Instructions for Form 400-CEQA.



South Coast Air Quality Management District

**FORM 400-PS****PLOT PLAN AND STACK INFORMATION FORM**Mail Application To:  
SCAQMD  
P.O. Box 4944  
Diamond Bar, CA 91765

Tel: (909) 396-3385

www.aqmd.gov

This form must be accompanied by a completed Application for a Permit to Construct/Operate -Form 400A and Form 400-CEQA

Permit to be issued to (Business name of operator to appear on permit):

Orange County Sanitation District

Address where the equipment will be operated (for equipment which will be moved to various location in AQMD's jurisdiction, please list the initial location site):

10844 Ellis Avenue, Fountain Valley, CA 92708

☒ Fixed Location ☐ Various Locations**SECTION A: LOCATION DATA**

Plot Plan	Please attach a site map for the project. Identify and locate the proposed equipment on the property. A copy of the appropriate Thomas Brothers page that shows the location, or a drawing or sketch that show the major street and identifies the location of the equipment is acceptable.		
Location of School Nearby	Is the facility located within a 1/4 mile radius (1,320 feet) of the outer boundary of a school? <input type="radio"/> Yes <input checked="" type="radio"/> No. If yes, please provide name(s) of school(s) below.		
	School Name	School Address	Distance from stack or equipment vent to the outer boundary of the school.
	Note: Per Section 42301.9 of the California Health and Safety Code, a "school" means any public or private school used for purposes of the education of more than 12 children in kindergarten or any of grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in.		
Population Density	<input checked="" type="radio"/> Urban (area of dense population) <input type="radio"/> Rural (area of sparse population)		
Zoning Classification	<input checked="" type="radio"/> Mixed Use Residential Commercial Zone (M-U) <input type="radio"/> Service and Professional Zone (C-S) <input type="radio"/> Medium Commercial (C-3) <input type="radio"/> Heavy Commercial (C-4) <input type="radio"/> Commercial Manufacturing (C-M)		

**SECTION B: EMISSION RELEASE PARAMETERS -STACKS, VENTS**

Stack Data	Stack Height:	15.25 feet (height above ground level)*	What is the height of the closest building nearest the stack ?	30.00 feet
	Stack Inside Diameter:	8.000 inches	Stack Flow:	900.000 acfm
			Stack Temperature:	750.00 °F
	Rain Cap Present:	<input type="radio"/> Yes <input checked="" type="radio"/> No	Stack Orientation:	<input checked="" type="radio"/> Vertical <input type="radio"/> Horizontal
	* If the stack height is less than 2.5 times the closest building height (H), please provide information on any building within 5xH distance from the stack(attach additional sheet if necessary)			
	Building #/name:	Belt Press Bldg. M		
	Building Height:	30.00 feet	Building Height:	feet
	Building Width:	78.00 feet	Building Width:	feet
	Building Length:	90.00 feet	Building Length:	feet
Receptor Distance from equipment stack or roof vents/openings	Distance to nearest residence	feet or 280.00 meters	Distance to nearest business	feet or 380.00 meters
Building Information	Are the emissions released from vents and/or openings from the building? <input type="radio"/> Yes <input checked="" type="radio"/> No			
	If yes, please provide:			
	Building height above ground level:	ft.	Building dimensions:	length ft. or width ft. Total square footage of building where the source of the emissions is located.

**SECTION C: APPLICANT CERTIFICATION STATEMENT**

I hereby certify that all information contained herein and information submitted with this application is true and correct.

SIGNATURE OF PREPARER:	TITLE OF PREPARER:	PREPARER'S TELEPHONE NUMBER:
	Regulatory Specialist	(714) 593-7082
		PREPARER'S E-MAIL ADDRESS: tahn@ocsd.com
CONTACT PERSON FOR INFORMATION ON THIS EQUIPMENT:	CONTACT PERSON'S	DATE SIGNED:
Terry Ahn	TELEPHONE NUMBER:	10/23/08
E-MAIL ADDRESS: tahn@ocsd.com	FAX NUMBER:	
	(714) 593-7082	
	(714) 962-8379	

**CONFIDENTIAL INFORMATION**

Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items as confidential, please complete the following steps:

- Make a copy of any page containing confidential information blanked out. Label this page "public copy."
- Label the original page "confidential." Circle all confidential items on the page.
- Prepare a written justification for the confidentiality of each confidential item. Append this to the confidential copy.



South Coast Air Quality Management District  
P. O. Box 4944 Diamond Bar, CA 91765  
(909) 396-2000

## EXPRESS PERMIT PROCESSING REQUEST FORM FORM 400 - XPP

Form 400-A, Form 400-CEQA and one or more 400-E-xx form(s) must accompany all submittals.

Print Form

### Section I - Facility/Application Information

1. Business Name: Orange County Sanitation District Facility ID: 17,301
2. The requested application is for a(n): Date of Occurrence: Mar 31, 2009
- a. ☒ New Construction b. ☐ Change of Location
- c. ☐ Modification of Equipment/Process d. ☐ Existing Equipment with Expired Permit
- e. ☐ Existing Equipment Operating without a Permit; Initial Operation Date:
- f. ☐ Change of Condition(s); specify the change of condition(s) requested:
- g. ☐ Change of Operator; List previous name of operator and Facility ID #:
3. I hereby request Express Permit Processing for this application.
4. I understand that this request will incur additional fees.
5. This request is not cancelable once engineering review has been initiated.
6. Express Permit Processing neither guarantees action by any specific date nor does I guarantee permit approval.

### Section II - Equipment Information

I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT.

SIGNATURE OF RESPONSIBLE OFFICIAL OF FIRM:

TITLE OF RESPONSIBLE OFFICIAL OF FIRM:

Mike D. Moore

Manager, ECRA

10-24-08

TYPE OR PRINT NAME OF RESPONSIBLE OFFICIAL OF FIRM:

RESPONSIBLE OFFICIAL'S TELEPHONE NUMBER

DATE SIGNED:

Mike D. Moore

714-593-7450

I HEREBY CERTIFY THAT ALL INFORMATION CONTAINED HEREIN AND INFORMATION SUBMITTED WITH THIS APPLICATION IS TRUE AND CORRECT.

SIGNATURE OF PREPARER:

TITLE OF PREPARER:

Terry Ahn

Regulatory Specialist

TYPE OR PRINT NAME OF PREPARER:

PREPARER'S TELEPHONE NUMBER

DATE SIGNED:

Terry Ahn

714-593-7082

10/23/08

AQMD USE ONLY		APPLICATION/TRACKING #	PROJECT #	TYPE B C D	EQUIPMENT CATEGORY CODE: /	FEE SCHEDULE: \$	VALIDATION
ENG. A R DATE	ENG. A R DATE	CLASS I III IV	ASSIGNMENT UNIT	ENGINEER	ENF. SECT.	CHECK/MONEY ORDER #	AMOUNT \$

## SCAQL PERMIT PROCESSING SYSTEM (PS)

## FEE DATA - SUMMARY SHEET

Application No : 491468

IRS/SS No:

Previous Application No:

Previous Permit No:

Company Name : ORANGE COUNTY SANITATION DISTRICT  
Equipment Street: 10844 ELLISAVE , FOUNTAIN VALLEY CA 92708  
Equipment Desc : UNSPECIFIED EQUIP/PROCESS (SCH C)

Facility ID: 17301

Equipment Type : BASIC

Fee Charged by: B-CAT

B-CAT NO. : 999993

C-CAT NO: 00

Fee Schedule: C

Facility Zone : 18

Deemed Compl. Date: 11/6/2008

Public Notice: NO

Evaluation Type : PERMIT TO CONSTRUCT/OPERATE (PC/PO)

Small Business: ☐

Disposition : Approve PC/PO, Recommended by Engineer

Higher Fees for Failing  
to Obtain a Permit: ☐

Lead Appl. No :

Identical Permit Unit: ☐

Air quality Analysis		\$0.00	Filing Fee Paid:	\$0.00
E.I.R		\$0.00	Permit Processing Fee Paid:	\$4,867.37
Health Risk Assessment		\$0.00	Permit Processing Fee Calculated*:	\$3,244.91
Significant Project		\$0.00	Permit Processing Fee Adjustment:	\$-1,622.46
Expedited Processing	Hours: 0.00	\$1,622.46		
Source Test Review	Hours: 0.00	\$0.00		
Time & Material	Hours: 0.00	\$0.00		
			Total Additional Fee:	\$1,622.46
			Additional Charge:	\$0.00

COMMENTS: R301 XPP = 7 HRS.

RECOMMENDED BY: GAURANG RAWAL

DATE: 11/10/2008

REVIEWED BY: COTDATE: 2/19/09

\* ADJUSTED FOR SMALL BUSINESS, IDENTICAL EQUIPMENT AND P/O NO P/C PENALTY



## SCAQMD PERMIT PROCESSING SYSTEM (PPS)

## AEIS DATA SHEET

Company Name : ORANGE COUNTY SANITATION DISTRICT

Facility ID : 17301

Equipment Address : 10844 ELLIS AVE

FOUNTAIN VALLEY CA 92708

Application Number : 491468

Equipment B-Cat : 999993

Estimated Completion Date : 11/10/08

Equipment C-Cat :

Equipment Type : Basic

Equipment Description : UNSPECIFIED EQUIP/PROCESS (SCH C)

Emittants	Emissions	
	R1 LB/HR	R2 LB/HR
CO	0.03	0.03
NOX	0.01	0.01
PM10	0.01	0.01
ROG	0.01	0.01
SOX	0.01	0.01

## Applicable Rules

1401	03/07/2008	New Source Review of Toxic Air Contaminants
401	11/09/2001	Visible Emissions
402	05/07/1976	Nuisance

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Daily Start Times :	00:00	00:00	00:00	00:00	00:00	00:00	00:00
Daily Stop Times :	24:00	24:00	24:00	24:00	24:00	24:00	24:00

User's Initials : GR01

Date: 11/10/08

Supervisor's Name :

CD

Review Date :

2/19/09

## NSR DATA SUMMARY SHEET

Application No: 491468  
Application Type: Permit to Construct  
Application Status: PENDAPPRV  
Previous Apps,Dev,Permit #: NONE

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Company Name: ORANGE COUNTY SANITATION DISTRICT  
Company ID: 17301  
Address: 10844 ELLIS AVE, FOUNTAIN VALLEY, CA 92708  
RECLAIM: NO  
RECLAIM Zone: 01  
Air Basin: SC  
Zone: 18  
Title V: YES

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Device ID: 0 - WASTE-TO-ENERGY  
Estimated Completion Date: 07-15-2009  
Heat Input Capacity: 0 Million BTU/hr  
Priority Reserve: NONE - No Priority Access Requested  
Recommended Disposition: 31 - PERMIT TO OPERATE GRANTED  
PR Expiration:  
School Within 1000 Feet: NO  
Operating Weeks Per Year: 52  
Operating Days Per Week: 7  
Monday Operating Hours: 00:00 to 24:00  
Tuesday Operating Hours: 00:00 to 24:00  
Wednesday Operating Hours: 00:00 to 24:00  
Thursday Operating Hours: 00:00 to 24:00  
Friday Operating Hours: 00:00 to 24:00  
Saturday Operating Hours: 00:00 to 24:00  
Sunday Operating Hours: 00:00 to 24:00

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Emittant: CO

BACT:

Cost Effectiveness: NO

Source Type: MAJOR

Emis Increase: 1

Modeling: N/A

Public Notice: N/A

CONTROLLED EMISSION

Max Hourly: 0.03 lbs/hr

Max Daily: 0.72 lbs/day

UNCONTROLLED EMISSION

Max Hourly: 0.03 lbs/hr

Max Daily: 0.72 lbs/day

CURRENT EMISSION

BACT 30 days Avg: 1 lbs/day

Annual Emission: 262.08 lbs/yr

District Exemption: 1301(b)(1)-12/07/1995-General (NSR) - attainment air contaminant

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Emittant: NOX

BACT:

Cost Effectiveness: NO

Source Type: MAJOR

Emis Increase: 0

Modeling: N/A

Public Notice: N/A

CONTROLLED EMISSION

Max Hourly: 0 lbs/hr

Max Daily: 0 lbs/day

UNCONTROLLED EMISSION

Max Hourly: 0 lbs/hr

Max Daily: 0 lbs/day

CURRENT EMISSION

BACT 30 days Avg: 0 lbs/day

Annual Emission: 0 lbs/yr

District Exemption: None

---

Emittant: PM10

BACT:

Cost Effectiveness: NO

Source Type: MINOR

Emis Increase: 0

Modeling: N/A

Public Notice: N/A

CONTROLLED EMISSION

Max Hourly: 0 lbs/hr

Max Daily: 0 lbs/day

UNCONTROLLED EMISSION

Max Hourly: 0 lbs/hr

Max Daily: 0 lbs/day

CURRENT EMISSION

BACT 30 days Avg: 0 lbs/day

Annual Emission: 0 lbs/yr

District Exemption: None

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Emittant: ROG  
BACT:  
Cost Effectiveness: NO  
Source Type: MINOR  
Emis Increase: 0  
Modeling: N/A  
Public Notice: N/A  
CONTROLLED EMISSION  
Max Hourly: 0 lbs/hr  
Max Daily: 0 lbs/day  
UNCONTROLLED EMISSION  
Max Hourly: 0 lbs/hr  
Max Daily: 0 lbs/day  
CURRENT EMISSION  
BACT 30 days Avg: 0 lbs/day  
Annual Emission: 0 lbs/yr  
District Exemption: None

Emittant: SOX  
BACT:  
Cost Effectiveness: NO  
Source Type: MINOR  
Emis Increase: 0  
Modeling: N/A  
Public Notice: N/A  
CONTROLLED EMISSION  
Max Hourly: 0 lbs/hr  
Max Daily: 0 lbs/day  
UNCONTROLLED EMISSION  
Max Hourly: 0 lbs/hr  
Max Daily: 0 lbs/day  
CURRENT EMISSION  
BACT 30 days Avg: 0 lbs/day  
Annual Emission: 0 lbs/yr  
District Exemption: None

SUPERVISOR'S APPROVAL: COT SUPERVISOR'S REVIEW DATE: 2/19/09

Processed By: gaurangr 11/10/2008 2:13:36 PM



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

February 19, 2009  
A/N 491468  
ID 017301

ORANGE COUNTY SANITATION DISTRICT  
10844 Ellis Avenue  
Fountain Valley, California 92708

Attention: Michael D. Moore, Manager, ECRA

Gentlemen:

## **PERMIT TO CONSTRUCT AND OPERATE EXPERIMENTAL RESEARCH OPERATIONS**

The system described below is granted a Permit to Construct and Operate (Application Number 491468) as allowed by and under the conditions set forth by Rule 441 of the Rules and Regulations of the South Coast Air Quality Management District and is subject to the special conditions listed.

### **EQUIPMENT DESCRIPTION:**

FUEL CELL HYDROGEN GAS GENERATION RESEARCH UNIT CONSISTING OF:

1. FUEL SUPPLY LINE(S).
2. FUEL PRE-TREATMENT SKID WITH AN ACTIVATED CARBON VESSEL.
3. MECHANICAL BALANCE OF PLANT (MBOP), CONTAINING A HEAT EXCHANGER, PURIFIED WATER AND AIR SUPPLY LINES, AND WITH AN EXHAUST VENT.
4. FUEL CELL MODULE WITH CATHODE AND ANODE ELECTRODES MADE OF POROUS NICKEL CATALYST, AND MOLTEN CARBONATE ELECTROLYTE.
5. ELECTRICAL BALANCE OF PLANT (EBOP) CONTAINING A DC TO AC POWER CONVERTER, AND AC POWER SUPPLY TO GRID.
6. ANODE EXHAUST SKID WITH A SYNGAS PROCESSOR.
7. HYDROGEN RECOVERY UNIT, STANDPIPE VENT, RELIEF VENT, AND A CONDENSATE DRAIN.

TO BE LOCATED AT: 10844 ELLIS AVENUE  
FOUNTAIN VALLEY, CA 92708

February 19, 2009

**CONDITIONS:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED, UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THIS EQUIPMENT SHALL BE OPERATED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
4. THIS EXPERIMENTAL RESEARCH PERMIT SHALL EXPIRE ON FEBRUARY 19, 2010. AN EXTENSION OF TIME MAY BE GRANTED UPON WRITTEN REQUEST.
5. ORANGE COUNTY SANITATION DISTRICT (OCS D) SHALL NOTIFY AQMD WHEN CONSTRUCTION IS COMPLETE AND BEFORE OPERATING THE EQUIPMENT DESCRIBED IN THIS PERMIT.
6. THIS EQUIPMENT SHALL PRIMARILY BE FUELED WITH DIGESTER GAS.
7. WITHIN 90 DAYS OF COMPLETION OF THE RESEARCH EXPERIMENTS, THE ORANGE COUNTY SANITATION DISTRICT SHALL SUBMIT TO AQMD A COMPLETE REPORT WITH CONCLUSION AND RESULTS, SUCH AS; SYSTEM PERFORMANCE, EFFICIENCY, AMOUNT AND TYPES OF FUELS USED, AMOUNT OF HYDROGEN RECOVERED, PARAMETERS MEASURED, MONITORED AND CONTROLLED.
8. ALL RECORDS SHALL BE KEPT FOR A PERIOD OF AT LEAST TWO YEARS AND SHALL BE MADE AVAILABLE TO AQMD PERSONNEL UPON REQUEST.

It is your responsibility to comply with all laws, ordinances and regulations of other government agencies, which are applicable to this equipment.

If you have any questions, please call Mr. Gaurang Rawal at (909) 396-2543.

Yours truly,



Charles Tupac, P.E.  
AQAC Supervisor  
Refinery and Waste Management Permitting

GCR: CDT  
cc: Sam Vergara, AQMD

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b>  <b>PERMIT APPLICATION EVALUATION AND CALCULATIONS</b>	PAGES 6	PAGE 1
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	PROCESSED BY GCR	CHECKED BY AD

**PERMIT TO CONSTRUCT AND OPERATE EVALUATION**  
**(RULE 441 RESEARCH PERMIT)**

**APPLICANT'S NAME:** ORANGE COUNTY SANITATION DISTRICT

**MAILING ADDRESS:** 10844 ELLIS AVENUE  
FOUNTAIN VALLEY, CA 92708  
ATTN: TERRY AHN, REGULATORY SPECIALIST

**EQUIPMENT ADDRESS:** SAME AS ABOVE

**FACILITY ID #:** 017301 (FOUNTAIN VALLEY, PLANT 1)

**EQUIPMENT DESCRIPTION:**

*SEE ~~SAFETY~~ 441 letter*

EXPERIMENTAL FUEL CELL ENERGY STATION, DIRECT FUEL CELL POWER PLANT, DFC 300, 300 KW POWER GENERATION, AND HYDROGEN RECOVERY UNIT, CONSISTING OF:

1. ANAEROBIC DIGESTER GAS, NATURAL GAS OR DIGESTER GAS/NATURAL GAS FUEL BLEND SUPPLY LINE.
2. FUEL PRE-TREATMENT SKID WITH AN ACTIVATED CARBON UNIT WITHIN A VESSEL.
3. MECHANICAL BALANCE OF PLANT (MBOP), WITH AN HEAT EXCHANGER, PURIFIED WATER AND AIR SUPPLY LINES, AND WITH AN EXHAUST PIPE, 8" DIA. X 15' H.
4. FUEL CELL MODULE WITH CATHODE AND ANODE ELECTRODES MADE OF POROUS NICKEL CATALYST, AND MOLTEN CARBONATE ELECTROLYTE.
5. ELECTRICAL BALANCE OF PLANT (EBOP) WITH DC TO AC POWER CONVERTER, AND AC POWER SUPPLY TO GRID.
6. ANODE EXHAUST SKID WITH A SYNGAS PROCESSOR.
7. HYDROGEN RECOVERY UNIT, WITH TAIL GAS, STANDPIPE VENT, RELIEF VENT, CONDENSATE DRAIN AND HYDROGEN SUPPLY LINE TO FUEL STATION.

**CONDITIONS:**

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED, UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b>  <b>PERMIT APPLICATION EVALUATION AND CALCULATIONS</b>	PAGES 6	PAGE 2
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3. THIS EQUIPMENT SHALL BE OPERATED BY PERSONNEL PROPERLY TRAINED IN ITS OPERATION.
4. THIS EXPERIMENTAL RESEARCH PERMIT SHALL EXPIRE ON NOVEMBER 30, 2009. AN EXTENSION OF TIME MAY BE GRANTED UPON WRITTEN REQUEST.
5. A FLOW INDICATOR SHALL BE INSTALLED IN THE FUEL OR FUEL BLEND (ANAEROBIC DIGESTER GAS AND NATURAL GAS) SUPPLY LINE TO THE FUEL PRETREATMENT SKID. IN CASE A PRESSURE SENSOR DEVICE IS USED INSTEAD OF THE FLOW INDICATOR, A CONVERSION CHART SHALL BE AVAILABLE TO INDICATE THE CORRESPONDENT FLOW RATE (IN S CFM) TO THE PRESSURE READING. THE FLOW RATE RECORDS SHALL BE MAINTAINED ON FILE.
6. FUEL FLOW MEASURED SHALL NOT EXCEED 75 SCFM DIGESTER GAS (PRIMARY FUEL) AND 39 SCFM NATURAL GAS.
7. THE OWNER OR OPERATOR OF THIS EQUIPMENT SHALL CONDUCT SOURCE TESTS UNDER THE FOLLOWING CONDITIONS:
  - A. THE TESTS SHALL BE CONDUCTED AND A WRITTEN REPORT SUBMITTED TO THE AQMD WITHIN 60 DAYS AFTER ACHIEVING MAXIMUM FUEL FLOW RATE, BUT NOT LATER THAN 180 DAYS AFTER INITIAL STARTUP. THE TESTS SHALL INCLUDE, BUT MAY NOT BE LIMITED TO, A TEST OF THE INLET FUEL (DG, NG OR BLEND) AND EQUIPMENT EXHAUST FOR:
    - a. METHANE, TOTAL NON-METHANE HYDROCARBONS, AND SPECIATED TOXIC AIR CONTAMINANTS.
    - b. C1 THROUGH C3 SULFUR COMPOUNDS (SPECIATED, INLET ONLY), AND SILOXANE.
    - c. CARBON MONOXIDE (EXHAUST ONLY)
    - d. OXIDES OF NITROGEN (EXHAUST ONLY)
    - e. CARBON DIOXIDE
    - f. TOTAL PARTICULATES (EXHAUST ONLY)
    - g. OXYGEN AND NITROGEN
    - h. MOISTURE CONTENT, TEMPERATURE AND FLOW RATE
    - i. POWER GENERATED (KW)
    - j. HYDROGEN RECOVERED
    - k. SILOXANES AND H2S REMOVAL EFFICIENCY (PRETREATMENT UNIT).

THE REPORT SHALL ALSO PRESENT THE EMISSIONS DATA IN UNITS OF POUNDS PER HOUR (LB/HR), LBS/ MWH, AND PARTS PER MILLION (PPMV).
  - B. A TEST PROTOCOL SHALL BE SUBMITTED TO THE AQMD, REFINERY AND WASTE MANAGEMENT PERMITTING, 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765, NOT LATER THAN 30 DAYS BEFORE THE PROPOSED TEST DATE AND SHALL BE APPROVED BY AQMD BEFORE THE TEST COMMENCES.
  - C. THE TEST SHALL BE PERFORMED BY A TESTING LABORATORY CERTIFIED TO MEET THE CRITERIA IN AQMD RULE 304 (I) (CONFLICT OF INTEREST).



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- D. THE AQMD ENGINEER SHALL BE NOTIFIED OF THE DATE AND TIME OF THE TEST AT LEAST 10 DAYS PRIOR TO THE TEST, OR WITHIN A TIME PERIOD AGREED UPON BY THE AQMD ENGINEER.
- E. SAMPLING FACILITIES SHALL COMPLY WITH AQMD "GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES" PURSUANT TO RULE 217.
- 8. THE OPERATOR SHALL CALCULATE THE MAXIMUM INDIVIDUAL CANCER RISK (MICR), ACUTE HAZARD INDEX (HIA) AND CHRONIC HAZARD INDEX (HIC), BASED ON THE SOURCE TESTS RESULTS, USING AQMD PUBLISHED "RISK ASSESSMENT PROCEDURES FOR RULES 1401 AND 212", VERSION 7.0, APRIL 30, 2008, TO DETERMINE THE COMPLIANCE WITH RULE 1401. RESULTS SHALL BE SUBMITTED TO AQMD.
- 9. WITHIN 90 DAYS OF COMPLETION OF THE RESEARCH EXPERIMENTS, THE ORANGE COUNTY SANITATION DISTRICT SHALL SUBMIT TO AQMD A COMPLETE REPORT WITH CONCLUSION AND RESULTS, SUCH AS; SYSTEM PERFORMANCE, EFFICIENCY, PARAMETERS MEASURED, MONITORED AND CONTROLLED.
- 10. ALL RECORDS SHALL BE KEPT FOR A PERIOD OF AT LEAST TWO YEARS AND SHALL BE MADE AVAILABLE TO AQMD PERSONNEL UPON REQUEST.

**BACKGROUND/DISCUSSION:**

*This application is for a <sup>Rule 441</sup> PC-PO at a 7.1 MeV facility.*

On October 30, 2008, Orange County Sanitation District (OCS D) submitted this application for the Rule 441 research permit, for a permit to construct and operate an experimental Fuel Cell Energy Station and hydrogen recovery unit. ~~The proposed fuel cell energy is ultra-clean, efficient and reliable power generating system.~~ The equipment will use anaerobic digester gas (primary fuel), natural gas or blend of DG / NG, as fuel. The intended purpose is to evaluate and demonstrate alternative source of energy (produce ~3000 kw electricity) to reduce overall energy costs while reducing emissions. Hydrogen gas recovered will be sent to net by Hydrogen Fueling Station, for use by the public. The proposed project is in collaboration with U.S. Department of Energy (DOE), California Air resources Board (CARB), Air Products and Chemicals, Inc. (APCI) and Fuel Cell Energy (FCE). The proposed temporary unit will be installed at OCS D, Plant 1, to be use for 6-month to a year.

Notice of Exemption was filed 5/5/2008, which was approved by the Lead Agency, with Office of Planning and Research, Sacramento. This was Categorical exemption. A copy of the NOE is included with application submittal.

**PROCESS DESCRIPTION:**

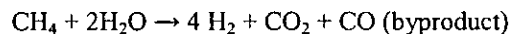
Following is the brief process description. For details please refer to the application package that also includes process flow block diagram and equipmet specifications for Direct Fuel Cell, DFC 300.

**Fuel Pretreatment:** Fuel (anaerobic digester gas as primary fuel, Natural gas or blend of Dg/NG ) will be pretreated by activated carbon media, contained within a vessel, to remove H<sub>2</sub>S, Siloxanes and other impurities. Natural gas = 39 scfm, or DG = 75 scfm.

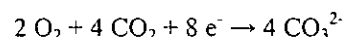
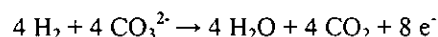
**Mechanical Balance of Plant (MBOP):** It provides preheating of water and fuel, humidification of the fuel and supply of the air. Cleaned (pretreated) DG and purified water are injected into the heat exchanger that take heat generated from the cathode exhaust gas. The heated humid fuel is routed to the preconverter where higher hydrocarbons are converted to methane to avoid carbon deposition on the fuel cell stacks.

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**Fuel Cell Module:** Fuel cell module consists of cathode and anode electrodes made of porous nickel catalysts and they are separated by molten carbonate ( $\text{CO}_3$ ) electrolyte. Methane in the fuel is reformed at the anode to form hydrogen ( $\text{H}_2$ ) and carbon dioxide ( $\text{CO}_2$ ). At the anode,  $\text{H}_2$  gas is stripped off of electrons which flows through an external circuit, producing DC power and  $\text{H}_2$  then return to the cathode. The chemical reaction is,

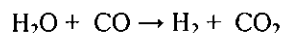


At the cathode,  $\text{O}_2$  from the air supplied by MBPO and  $\text{CO}_2$  recycled from from the anode off-gas react with electrons to produce carbonate ions. The carbonate ions flow through the molten carbonate electrolyte to the fuel cell anode. The heat generated due to chemical reaction is used to heat incoming fuel and water in the MBOP.



**Electrical Balance of Plant (EBOP):** Here DC power is converted to AC power and electricity is sent to the grid.

**Hydrogen Recovery Unit:** Off-gas from the anode contains  $\text{H}_2$ ,  $\text{CO}$ ,  $\text{CO}_2$  and  $\text{H}_2\text{O}$ , the combination of gases is commonly called Syn gas.  $\text{H}_2$  is shifted to maximize the hydrogen production. It is then sent to the hydrogen purification unit that uses principle of pressure swing adsorption in order to separate  $\text{H}_2$  from the other products.  $\text{CO}_2$  and other reformat products are adsorbed on the adsorbent beds at high pressure while  $\text{H}_2$  passthrough unadsorbed.  $\text{H}_2$  is then compressed and sent to the fueling station for use by the public.



Tail gases, from the hydrogen recovery unit, mostly  $\text{CO}_2$ ,  $\text{H}_2\text{O}$  and residual  $\text{H}_2$  is sent to the cathode side of the fuel cell module, where  $\text{CO}_2$  is converted to  $\text{CO}_3$  to complete the fuel cell circuit. Any excess  $\text{CO}_2$  and water leave the cathode as exhaust.

Operating Schedule: 24 hrs/day, 7 days/wk, 52 wks/yr.

#### **EMISSIONS:**

Estimated criteria pollutants' emissions based on manufacturer's EF data for 3000 kw NG fuel cell.

POLLUTANT	LBS/MWH	LBS/HR	LBS/DAY
CO	0.1	0.035	0.84
NOX	0.01	0.0035	0.08
PM10	0.00002	0.000007	0
SOX	0.0001	0.00003	0
VOC	0.01	0.003	0.07

Note: No emission limits imposed for the permit due to very low emissions expected, however, source test required to determine emissions for this research permit.

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### **RISK ASSESSMENT:** (MICR, HIC & HIA)

Risk is evaluated based on 75 scfm anaerobic digester gas concentrations provided, prior to pretreatment.

Please refer to the HRA analysis results, R1401 spreadsheet, included in folder.

Risk is estimated using SCREEN 3 analysis, building downwash effects, and maximum ground level 1-hr concentration at nearest residence = 280 m, nearest business = 380 m).

Maximum MICR ( R ) receptor = **1.46E-07**

Maximum MICR ( C ) receptor = 1.90E-08

HIC and HIA values are < 1 for each targeted organ.

### **H2S ODOR CONTROL ANALYSIS:**

SCREEN 3 model analysis indicated 1-hr maximum ground level con. at 25 meters = 386.0 mcg/m<sup>3</sup> ( Bldg. Cavity-2) for 1 lb/hr emission rate.

H2S emission used is the worst-case scenario (that is assuming no reduction for DG inlet H2S concentration from the pre-treatment unit containing activated carbon media) = 0.0128 lbs/hr H2S (R1401 spreadsheet, R1 = R2)

@ 0.0128 lbs H2S /hr x 386 mcg/m<sup>3</sup> / 1 lb/hr = 4.94 mcg/m<sup>3</sup>  
= 4.94 x 0.02445 / 34  
= 0.0035 ppmv H2S  
= 3.5 ppbv < 30 ppbv H2S limit under CSAAQS.  
< 8 ppbv H2S odor threshold under OEHHA.

California State Ambient Air Quality Standard (CSAAQS)

California Office of Environmental Health Hazard Assessment Office (OEHHA).

### **RULES EVALUATION**

**RULE 212:** There are no schools within 1000' of source. This is a research project expected to run for about 1 yr. Daily emissions are negligible. Risk is estimated at less than one in a million (1.46 E-07). Compliance with this rule is expected.

**REG. IV:** This is an experimental research permit. Equipment is exempt form Regulation IV requirements, except for Rule 402.

**RULE 402:** Nuisance complaints are not expected with the proper operation and monitoring of the equipment.

**REG XIII:** Daily emissions are estimated to be < 1 lb for each criteria pollutant. No BACT is required. No modeling is required.  
Estimated CO emission is 0.84 lbs/day requiring 1 lb offset. For NSR, CO is considered < 1 lb/day, and is not subject to BACT. However, CO is in attainment, thefore, is exempt from offset per Rule 1301(b)(1)-General NSR- attainment air contaminant. (See E-mail from Mohsen Nazemi, August 09, 2007, in folder).  
Compliance with this regulation is expected.

**RULE 1401:** Estimated risk is 1.46E-07 from the experimental fuel cell energy station and H2 recovery unit. HIC & HIA indices estimated to be < 1, for each targated organ. Compliance is expected.

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**RULE 1401.1:**

Not applicable. This is an existing facility.

xxx :

Rule 3004 provides that R441 research shall not be included in the TV permit.

**CONCLUSIONS/RECOMMENDATION:**

The above equipment is expected to comply with all applicable District's Rules and Regulations. Rule 441 Permit to construct and operate is recommended subject to conditions listed on Pg. 1-3.

**Amir Dejbakhsh**

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**From:** Ahn, Terry [tahn@ocsd.com]  
**Sent:** Tuesday, February 10, 2009 1:51 PM  
**To:** Amir Dejbakhsh  
**Cc:** Kogan, Vlad  
**Subject:** Source Testing Requirement for OCSD Fuel Cell Energy Station - A/N 491468

Hi Amir,

This in response to your phone call on 1/22 regarding source testing requirement for fuel cell energy station – A/N 491468. I'm sorry it took some time for me to get the information from all of the participants of this research project. Bottom line is that there is no air quality source testing provision in our contractual agreements with the various agencies. However, our fuel cell energy station being pilot-sized and temporary, we would like to propose to SCAQMD to accept empirical data from tests conducted at similar treatment facilities such as Riverside or Eastern Municipal Water District (EMWD).

As you may know both of these facilities have full-scale digester gas fuel cell station with the fuel cell unit supplied by the same vendor (FuelCell Energy - FCE) as ours. In fact, EMWD has three fuel cells of the same model as ours. Our FCE contact has indicated that Riverside has completed its first round of testing with satisfactory results. EMWD's system is on line and FCE expects source test to take place soon. If EMWD's test results are satisfactory, it may further motivate SCAQMD to extend the existing Rule 219 exemption for fuel cells to those operated on digester gas.

With that, I'd like to ask you to waive the source testing requirement in our research permit pending SCAQMD's determination of relevance, applicability, and acceptance of the source test results from the facilities mentioned above. Source testing is very expensive and takes a lot of coordination and effort. For our short term research project, requiring same source testing requirement as the full-scale projects seems excessive.

Please let me know if you'd like to discuss this further. Thank you.

**Terry Ahn**

Orange County Sanitation District  
Environmental Compliance & Regulatory Affairs, Div 620  
(714) 593-7082

2/19/2009

11/10/08  
10:28:50

\*\*\* SCREEN3 MODEL RUN \*\*\*  
\*\*\* VERSION DATED 96043 \*\*\*

491468, OCSD, FV, FUEL CELL

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	.126100
STACK HEIGHT (M)	=	4.6480
STK INSIDE DIAM (M)	=	.2030
STK EXIT VELOCITY (M/S)	=	13.1236
STK GAS EXIT TEMP (K)	=	671.8900
AMBIENT AIR TEMP (K)	=	293.0000
RECEPTOR HEIGHT (M)	=	1.5000
URBAN/RURAL OPTION	=	URBAN
BUILDING HEIGHT (M)	=	9.1500
MIN HORIZ BLDG DIM (M)	=	23.8000
MAX HORIZ BLDG DIM (M)	=	27.4000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.  
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

STACK EXIT VELOCITY WAS CALCULATED FROM  
VOLUME FLOW RATE = 900.00000 (ACFM)

BUOY. FLUX = .748 M\*\*4/S\*\*3; MOM. FLUX = .774 M\*\*4/S\*\*2.

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
\*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
\*\*\*\*\*

\*\*\* TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES \*\*\*

LIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
10.	.0000	0	.0	.0	.0	.00	.00	.00	NA
100.	132.0	4	1.0	1.0	320.0	7.97	18.58	13.79	SS
200.	68.96	6	1.0	1.0	10000.0	10.67	28.27	16.78	SS
300.	41.95	6	1.0	1.0	10000.0	10.67	38.04	22.42	SS
400.	28.40	6	1.0	1.0	10000.0	10.67	47.49	27.58	SS
500.	20.73	6	1.0	1.0	10000.0	10.67	56.63	32.35	SS

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 10. M:  
28. 305.7 1 1.0 1.0 320.0 6.27 12.81 7.06 SS

DWASH= MEANS NO CALC MADE (CONC = 0.0)  
DWASH=NO MEANS NO BUILDING DOWNWASH USED  
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED  
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED  
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3\*LB

\*\*\*\*\*  
\*\*\* SCREEN DISCRETE DISTANCES \*\*\*  
\*\*\*\*\*

\*\*\* TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES \*\*\*

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
20.	.0000	0	.0	.0	.0	.00	.00	.00	NA
30.	290.2	1	1.0	1.0	320.0	6.37	12.87	7.31	SS
→280. (R)	45.89 /	6	1.0	1.0	10000.0	10.67	36.11	21.33	SS
→380. (C)	30.49 /	6	1.0	1.0	10000.0	10.67	45.62	26.58	SS

DWASH= MEANS NO CALC MADE (CONC = 0.0)  
 DWASH=NO MEANS NO BUILDING DOWNWASH USED  
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED  
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED  
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3\*LB

\*\*\*\*\*  
 \* SUMMARY OF TERRAIN HEIGHTS ENTERED FOR \*  
 \* SIMPLE ELEVATED TERRAIN PROCEDURE \*  
 \*\*\*\*\*

TERRAIN HT (M)	DISTANCE RANGE (M)	
	MINIMUM	MAXIMUM
0.	10.	500.
0.	20.	--
0.	30.	--
0.	280.	--
0.	380.	--

\*\*\*\*\*  
 \*\*\* REGULATORY (Default) \*\*\*  
 PERFORMING CAVITY CALCULATIONS  
 WITH ORIGINAL SCREEN CAVITY MODEL  
 (BRODE, 1988)  
 \*\*\*\*\*

*** CAVITY CALCULATION - 1 ***	*** CAVITY CALCULATION - 2 ***
CONC (UG/M**3) = 335.3	CONC (UG/M**3) = 386.0
CRIT WS @10M (M/S) = 1.19	CRIT WS @10M (M/S) = 1.27
CRIT WS @ HS (M/S) = 1.19	CRIT WS @ HS (M/S) = 1.27
DILUTION WS (M/S) = 1.00	DILUTION WS (M/S) = 1.00
CAVITY HT (M) = 9.65	CAVITY HT (M) = 9.45
CAVITY LENGTH (M) = 27.42	CAVITY LENGTH (M) = 25.24
ALONGWIND DIM (M) = 23.80	ALONGWIND DIM (M) = 27.40

\*\*\*\*\*  
 END OF CAVITY CALCULATIONS  
 \*\*\*\*\*

\*\*\*\*\*  
 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 \*\*\*\*\*

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	305.7	28.	0.

BLDG. CAVITY-1	335.3	27.	-- (DIST = CAVITY LENGTH)
BLDG. CAVITY-2	386.0	25.	-- (DIST = CAVITY LENGTH)

\*\*\*\*\*  
\*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*  
\*\*\*\*\*



## SCREENING INPUT

Table A

modeling emissions rate	1.00	lb/hr
modeling emissions rate	4.38	tons/yr
Max hr/day	24	hr/day
day per week	7	dy/wk
wk/yr	52	wk/yr
MODELING RESULTS -MAX ONE HOUR		
Distance residence	280.00	meter
Max. 1-hour Conc. Residence	45.89	ug/m3
Annualized Conc. Residence	3.67	ug/m3
Distance Commercial	380.00	meter
Max. 1-hour Conc. Commercial	30.49	ug/m3
Annualized Conc. Commercial	2.44	ug/m3

## Annualized X/Q

X/Q Residential	0.83817	(ug/m^3)/(tons/yr)
X/Q Commercial	0.55689	(ug/m^3)/(tons/yr)

## Max. X/Q

X/Q Residential	45.89	(ug/m^3)/(lbs/hr)
X/Q Commercial	30.49	(ug/m^3)/(lbs/hr)

Table B

Sta Ht:	Interpolation		row:	I	X/Q for one-in-a-million near actual far
	near	far			
distance	280.00				
X/Q - 1 hr conc ug/m3	45.89				
X/Q Annualized (ug/m^3)/(tons/yr)	0.84				
				0.56	

## CONVERSION CALCULATOR To Convert from British to Metric Units

## STACK DATA

actual exhaust rate	900.00	acfm
Temp.	750.00	degree F
Stack diameter	8.00	in
Stack height	15.25	ft
modeling emissions rate	1.00	lb/hr

## SCREEN INPUT DATA

Temp	671.889	degrees k
Stack dia	0.203	meter
Stack area	0.032	square meter
Stack height	4.648	meter
Stack velocity	13.105	m/s
modeling emissions rate	0.12611	gr/s

Application deemed complete date:	1/10/08
-----------------------------------	---------

A/N: 491488  
Fac: CCSD-FV FUELL CELL ENERGY STN.

1. Stack Data		Units
Hour/Day		24 hr/day
Day/Week		7 day/wk
Week/Year		52 wk/yr
Emission Units (non-combustion only)		None
Control Efficiency (other non-combustion only)		Fraction range 0-1
Does source have TBACT?		NO
Point or Volume Source?		P or V
Stack Height or Building Height		feet
Area (for Volume Source Only)		ft <sup>2</sup>
Distance-Residential		300 meters
Distance-Commercial		300 meters
Distance-Metropolitan		300 meters
Metecological Station		Costa Mesa

Source Type:	O - Other
Screening Mode	YES

Emission Units	lb/hr
Source output capacity	n/a

FOR USER-DEFINED CHEMICALS AND EMISSIONS, FILL IN THE TABLE BELOW

[illegible]



# TIER 1 SCREENING RISK ASSESSMENT

Receptor Distance (actual)	280
Receptor Distance (for X/Q lookup)	100

Tier 1 Results	
Chronic ASI	Acute ASI
3.95E+00	1.14E-01
FAILED	passed

APPLICATION SCREENING INDEX CALCULATION						
Code	Compound	Average Annual Emission Rate (lbs/yr)	Max Hourly Emission Rate (lbs/hr)	Cancer / Chronic Pollutant Screening Level (lbs/yr)	Acute Pollutant Screening Level (lbs/hr)	Cancer / Chronic Pollutant Screening Index (PSI)
B1	Benzene (including benzene from gasoline)	1.57E+00	1.80E-04	8.92291821	3.955214799	1.76E-01
C2	Carbon disulfide	2.08E-02	2.38E-06	206718.3463	18.86333212	1.01E-07
D4	Dichlorobenzene, p- (or 1,4-dichlorobenzene)	1.59E+01	1.82E-03	22.30729552	N/A	7.13E-01
E4	Ethyl benzene	7.46E+00	8.34E-04	516795.8656	N/A	1.44E-05
H12	Hydrogen sulfide	1.12E+02	1.28E-02	2583.979328	0.112449799	4.33E-02
M13	Methylene chloride(Dichloromethane)	2.42E-01	2.77E-05	0.094508008	N/A	2.56E+00
P2	Perchloroethylene (or tetrachloroethylene)	8.24E+00	9.43E-04	42.49008671	53.54752343	1.94E-01
T3	Toluene (methyl benzene)	3.88E+01	4.44E-03	77519.37984	99.06291834	5.00E-04
T8	Trichloroethylene	6.37E+00	7.29E-04	127.4702601	N/A	5.00E-02
V5	Vinyl chloride (chloroethylene)	7.05E-01	8.07E-05	3.304784522	481.9277108	2.13E-01
X1	Xylenes (isomers and mixtures)	1.52E+01	1.74E-03	180878.553	58.90227577	8.40E-05
TOTAL (APPLICATION SCREENING INDEX)						3.95E+00 1.14E-01

# TIER 3 SCREENING RISK ASSESSMENT

491468 Application deemed complete date 11/06/08

A/N: 491468  
Fac: OCSD-FV, FUELL CELL ENERGY STN.

## 2. Tier 2 Data

MET Factor	1.00
4 hr	0.87
6 or 7 hrs	0.88

## Dispersion Factors

3	3A & 3B For Chronic N/Q
6	For Acute N/Q

## Dilution Factors (ug/m3)/(tons/yr)

Receptor	N/Q	N/Qmax
Residential	0.838173516	45.89
Commercial	0.556894977	30.49

## Adjustment and Intake Factors

	Afann	DBR	EVF
Residential	1	302	0.96
Worker	1	149	0.38

### 3. Rule 1401. Compound Data

[illegible]

	uncontrolled	controlled
--	--------------	------------

	uncontrolled	controlled
--	--------------	------------

Date: 11/06/08

## 5. MICR

$$\text{MICR} = \text{CP} \text{ (mg/(kg-day))}^{-1} \cdot Q \text{ (ton/yr)} \cdot (X/Q) \cdot \text{Afann} \cdot \text{Met} \cdot \text{DBR} \cdot \text{EVF} \cdot 1.E-6 \cdot \text{MP}$$

Compound	Residential	Commercial
Carbon (including benzene from gasoline)	1.91E-08	2.48E-09
Carbon disulfide		
Dichlorobenzene, p- (or 1,4-dichlorobenzene)	7.73E-08	1.00E-08
Ethyl benzene		
Hydrogen sulfide		
Methylene chloride(Dichloromethane)	1.03E-10	1.34E-11
Perchloroethylene (or tetrachloroethylene)	2.10E-08	2.73E-09
Toluene (methyl benzene)		
Trichloroethylene	5.42E-09	7.03E-10
Vinyl chloride (chloroethylene)	2.31E-08	3.00E-09
Xylenes (isomers and mixtures)		
<b>Total</b>	<b>1.46E-07</b>	<b>1.90E-08</b>

No. cancer Burden, MCCR < 1 E=6	
5a. Cancer Burden	no
XQ for one-in-a-million:	
Distance (meter)	no data
Area (km2):	
Population:	
Cancer Burden:	



## 6. Hazard Index

$$HIA = [Q(lb/hr) * (X/Q)_{max}] * AF / \text{Acute REL}$$

$$HIC = [Q(\text{ton/yr}) * (X/Q) * MET * MP] / \text{Chronic REL}$$

Target Organs	Acute	Chronic
Cardiovascular or blood system		1.09E-04
Central or peripheral nervous system		
Gastrointestinal system and liver	6.23E-06	1.56E-06
Immune system	1.18E-05	2.54E-07
Kidney	1.13E-05	6.67E-05
Reproductive system	6.23E-06	4.45E-06
Respiratory system	1.40E-02	1.10E-05
Skin	1.18E-05	4.45E-06
Eye	1.13E-05	1.09E-04
Endocrine system		

A/N: 491468

Date: 11/05/08

## 6a. Hazard Index Acute

$$HIA = [Q(b/hr) \cdot (X/Q)_{max}] \cdot AF/Acute REL$$

HIA - Residential

Compound	AL	CV	DEV	EYE	HENI	MM	NS	REP	RESP	SKIN
Benzene (including benzene			6.23E-06		6.23E-06	6.23E-06	1.73E-08	6.23E-06		
Carbon disulfide			1.73E-08					1.73E-08		
Dichlorobenzene, p- (or 1,4-							1.40E-02			
Ethyl benzene							9.08E-08			
Hydrogen sulfide							2.16E-06			
Methylene chloride(Dichloro				2.16E-06			5.51E-06		2.16E-06	
Perchloroethylene (or tetrach			5.51E-06	5.51E-06			5.51E-06	5.51E-06	5.51E-06	
Toluene (methyl benzene)							2.06E-08		2.06E-08	
Trichloroethylene				2.06E-08					3.63E-06	
Vinyl chloride (chloroethyl				3.63E-06						
Xylenes (isomers and mixtur										
<b>Total</b>			1.18E-05	1.13E-05	6.23E-06	6.23E-06	1.40E-02	1.18E-05	1.13E-05	

HIA - Commercial									
Compound	AL	CV	DEV	EYE	HEM	IMM	NS	REP	SKIN
Benzene (including benzene)			4.14E-06		4.14E-06	4.14E-06	1.15E-08	4.14E-06	
Carbon disulfide			1.15E-08					1.15E-08	
Dichlorobenzene, p- (or 1,4-)									
Ethyl benzene									
Hydrogen sulfide							9.29E-03		
Methylene chloride(Dichloro)							6.03E-08		
Perchloroethylene (or tetrach				1.44E-06			1.44E-06	1.44E-06	
Toluene (methyl benzene)			3.66E-06	3.66E-06			3.66E-06	3.66E-06	
Trichloroethylene									
Vinyl chloride (chloroethylene)				1.37E-08			1.37E-08	1.37E-08	
Xylenes (isomers and mixtur				2.41E-06				2.41E-06	
<b>Total</b>			7.81E-06	7.52E-06	4.14E-06	4.14E-06	9.30E-03	7.81E-06	7.52E-06

## 6b. Hazard Index Chronic

HIC = [C(ten)/n] \* (X/C) \* MET \* MPI / Chronic REL

Compound	HIC - Residential												
	AL	BN	CV	DEV	END	EYE	HEN	IMM	KID	NS	REP	RESP	SKIN
Benzene (including benzene Carbon disulfide Dichlorobenzene, p- (or 1,4- Ethyl benzene Hydrogen sulfide Methylene chloride(Dichloro Perchloroethylene (or tetrach Toluene (methyl benzene) Trichloroethylene Vinyl chloride (chloroethylene Xylenes (isomers and mixtur	8.33E-06 1.56E-06  9.86E-05		2.54E-07	1.10E-05 1.56E-06  5.42E-05	1.56E-06		1.10E-05		8.33E-06 1.56E-06  9.86E-05	1.10E-05 1.09E-08 8.33E-06 2.54E-07 5.42E-05 9.10E-06	1.09E-08	8.33E-06 4.69E-03  5.42E-05 4.45E-06 9.10E-06	
Total	1.09E-04		2.54E-07	6.67E-05	1.56E-06	4.45E-06	1.10E-05	4.45E-06	1.09E-04	8.29E-05	1.09E-08	4.76E-03	

A/N: 491468

Date: 11/06/08

Compound	HIC - Commercial												SKIN
	AL	BN	CV	DEV	END	EYE	HEM	IMM	KID	NS	REP	RESP	
Benzene (including benzene Carbon disulfide Dichlorobenzene, p- (or 1,4- Ethyl benzene Hydrogen sulfide Methylene chloride(Dichloro Perchloroethylene (or tetrach Toluene (methyl benzene) Trichloroethylene Vinyl chloride (chloroethylene Xylenes (isomers and mixtur	5.53E-06 1.04E-06    6.55E-05		1.68E-07	7.30E-06  1.04E-06  3.60E-05	  1.04E-06	   2.96E-06	7.30E-06		5.53E-06 1.04E-06  6.55E-05	7.30E-06 7.24E-09 5.53E-06  1.68E-07 3.60E-05  6.05E-06	7.24E-09	5.53E-06  3.11E-03  3.60E-05 2.96E-06  6.05E-06	
Total	7.21E-05		1.68E-07	4.43E-05	1.04E-06	2.96E-06	7.30E-06	2.96E-06	7.21E-05	5.51E-05	7.24E-09	3.16E-03	



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

11/6/2008

TERRY AHN  
ORANGE COUNTY SANITATION DISTRICT  
P O BOX 8127  
FOUNTAIN VALLEY, CA 92728

Facility ID: 17301  
Located at: 10844 ELLIS AVE, FOUNTAIN VALLEY

Thank you for filing your application(s) with the South Coast Air Quality Management District (AQMD).

The application number(s) assigned by AQMD to your application package(s) is/are on Page 2 of this letter. Please refer to the information on Page 2 when contacting AQMD for assistance. The information you submitted with your application(s) or in your latest submittal is complete to the extent that allows us to begin processing of your application(s), however some clarifying data may still be needed. The acceptance of your application(s) does not imply that permit(s) has/have been approved. The engineer assigned to process your application(s), as indicated below, may contact you if additional information is required.

If you have any question or need additional information about your application(s), please contact the engineer listed below:

**Engineer:** Gaurang Rawal

**Telephone:** (909) 396 - 2543

For general information about AQMD's permitting process, please call (909) 396-2468.

cc: Application file(s)

## AQMD PERMIT APPLICATION INFORMATION

(Please refer to this information when contacting AQMD for Assistance)

11/6/2008

Facility ID: 17301

Application Number (s)	Equipment Description
491468	UNSPECIFIED EQUIP/PROCESS (SCH C)

*Fuel Cell Energy station  
& H<sub>2</sub> Recovery unit  
(Research Permit)*

# Notice of Exemption

Form D

To: ☒

Office of Planning and Research  
PO Box 3044,  
1400 Tenth Street, Room 222  
Sacramento, CA 95812-3044

From:

Orange County Sanitation District  
10844 Ellis Avenue  
Fountain Valley, CA 92708

☒

County Clerk  
County of Orange  
12 Civic Center Plaza  
PO Box 238  
Santa Ana, CA 92701-0238

FILED

MAY 05 2008

TOM DALY, CLERK-RECORDER

DEPUTY

# 211924

Project Title:

PROJECT NO. SP-134 Fuel Cell Hydrogen Gas Generation Research

Project Location  
(Specific):

OCSD Reclamation Plant No. 1, 10844 Ellis Avenue Fountain Valley, CA

Project Location  
(City):

Fountain Valley

Project Location (County):

Orange

Description of  
Project:

This is a collaborative project between UCI, California Department of Transportation, Air Products, and Fuel Cell Technologies to create hydrogen gas from OCSD's digester gas and provide a mobil hydrogen auto fueling station at Plant No. 1. OCSD's portion of the larger project is for the installation of utilities and site preparation for the equipment at Plant No. 1.

Name of Public Agency Approving Project:

Orange County Sanitation District  
10844 Ellis Avenue, Fountain Valley, CA 92708

Name of Person or Agency Carrying Out Project:

Orange County Sanitation District  
10844 Ellis Avenue, Fountain Valley, CA 92708

Exempt Status: (Check One)

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☒ Categorical Exemption. State type and section number:
- ☐ Statutory Exemptions. State code number:

POSTED

MAY 05 2008

TOM DALY, CLERK-RECORDER

By

DEPUTY

15306

Reasons why

project is exempt:

This project is research which do not result in a serious or major disturbance to an environmental resource.

Lead Agency

Contact Person:

Jim Burror

Area Code /

Telephone/Extension:

714-593-7335

If filed by applicant:

- 1 Attach certified document of exemption finding.
- 2 Has a Notice of Exemption been filed by the public agency approving the project? YES ☐ NO ☐

Signature:

Jim Burror, P.E.

Date: 5/5/08

Title: Engineering Supervisor

☒ Signed by Lead Agency

☐ Signed by Applicant

Recorded in Official Records, Orange County  
Tom Daly, Clerk-Recorder

Date

NO FEE

200885000475 04:30pm 05/05/08

90 83 Z01

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## **Supplemental Information**

### **Temporary Fuel Cell Energy Station at Plant No. 1 (OCSD Job No. SP-134)**

#### **Project Overview**

The proposed project involves the construction of a temporary Fuel Cell Energy Station at OCSD's Treatment Plant No.1. It will consist of the fuel cell system and the hydrogen recovery unit. The fuel cell will primarily be fueled with digester gas from the Plant No. 1's anaerobic digestion process to create electricity and excess Hydrogen (H<sub>2</sub>) gas will be routed to the onsite hydrogen car fueling station. The natural gas or the mixture of digester and natural gases may also be used. The proposed Fuel Cell Energy Station will be installed at OCSD for a temporary demonstration period of six months to one year.

#### **Project Background**

The proposed project is a collaborative effort among the United States Department of Energy (DOE), California Air Resources Board (CARB), Air Products and Chemicals, Inc. (Air Products), and FuelCell Energy (FCE). Air Products has secured the funding from DOE and CARB to manufacture, install, operate, and eventually remove the temporary Fuel Cell Energy Station. In order to promote research into alternative sources of energy to reduce its overall energy costs while reducing air emissions, OCSD has entered into a contractual agreement with Air Products to provide digester gas and funding for site improvements and installation of utilities.

#### **Process Description**

The attached Figure 1 - Fuel Cell Energy Station Process Flow Diagram shows the overview of the proposed Fuel Cell Energy Station process as described below:

##### ***Fuel Cell System Process Overview***

The fuel cell system, provided by FuelCell Energy, consists of fuel pretreatment skid, Direct FuelCell Powerplant (power plant), and anode exhaust skid. The power plant consists of three subsystem sections: Mechanical Balance of Plant (MBOP); Fuel Cell Module, and Electrical Balance of Plant (EBOP). The MBOP provides such functions as preheating of water and fuel, humidification of the fuel and supply of the air. The EBOP contains DC/AC converter, power metering, switching equipment and the voltage transformer.

Before the digester gas from the OCSD's anaerobic digestion process can be used in the Fuel Cell Module, it is first treated to remove contaminants such as siloxanes and

hydrogen sulfide in the fuel pre-treatment system which uses the activated carbon within a vessel. In MBOP, the cleaned digester gas and purified water are then simultaneously injected into the heat exchanger which takes heat from the cathode exhaust gas. The heated humid fuel is then routed to the preconverter vessel where any higher hydrocarbons are converted to methane to avoid depositing carbon on the fuel cell stacks.

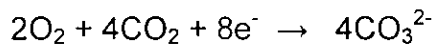
The treated fuel then enters the Fuel Cell Module which is made up of cathode and anode electrodes which are porous nickel catalysts separated by the molten carbonate electrolyte. Methane in the fuel is internally reformed at the anode to form hydrogen and carbon dioxide (CO<sub>2</sub>) via the following reaction:



The hydrogen gas is then stripped off of their electrons in the anode, and the electrons flow through an external circuit, producing DC power and then return to the cathode. The DC power from the Fuel Cell Module is converted to AC power in the EBOP of the fuel cell skid. The electrochemical reaction is shown below:

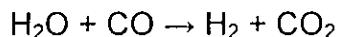


In the cathode, O<sub>2</sub> from the air supplied by MBOP and CO<sub>2</sub> recycled from the anode off-gas react with electrons to produce carbonate ions (CO<sub>3</sub><sup>2-</sup>) as shown in the reaction below. The carbonate ions flow through the molten carbonate electrolyte to the fuel cell anode. This reaction generates heat which is used to heat incoming fuel and water in the MBOP.



### ***Hydrogen Recovery Unit Process Overview***

The off-gas from the anode contains 10% H<sub>2</sub> (wet basis), CO byproduct, CO<sub>2</sub> and H<sub>2</sub>O. This combination of gases is commonly called Syngas. The Syngas is sent to the anode exhaust skid where it is cooled by heating the return CO<sub>2</sub> and then increases the hydrogen content by reacting water and CO to produce H<sub>2</sub> and CO<sub>2</sub> via following water-gas-shift (Shift) reaction:



This increases the H<sub>2</sub> concentration in the Syngas to 23% (dry basis). The Syngas is cooled further by preheating the air used in the fuel cell cathode and shifted the second time to maximize the hydrogen production. This shifted Syngas is then sent to the Hydrogen Purification Skid. The hydrogen purification is achieved by using the principle of pressure swing adsorption in order to separate the hydrogen from the other reformat

products. Carbon dioxide and other reformat products in the Syngas are adsorbed on the adsorbent beds at high pressure while the  $H_2$  molecules pass through the bed un-adsorbed. The separation is achieved by selecting an adsorbent that has a much lower affinity for hydrogen as compared to the other reformat products. The hydrogen is then compressed for sent to the Hydrogen Fueling Station which is located near the Plant No. 1 entrance for use by the public.

The tail gas, which consists mostly of  $CO_2$ ,  $H_2O$  and residual  $H_2$ , from the hydrogen purification process is sent to the cathode side of the Fuel Cell Module. As described above, the fuel cell cathode converts  $CO_2$  to the energy carrier,  $CO_3^{2-}$  to complete the fuel cell circuit. Any excess  $CO_2$  and water leave the cathode as exhaust.

### **Operating Schedule**

The proposed Fuel Cell Energy Station will operate 24 hours per day, 7 days per week during the 6 month to 1 year demonstration period.

### **Project Location**

The proposed Fuel Cell Energy Station will be located at Plant 1 as shown in Drawing No. G0003.

### **Project Schedule**

The construction of the proposed Fuel Cell Energy Station is scheduled to begin in March 2009. The demonstration period is expected to begin in July 2009.

### **Fuel Cell Equipment Specification**

The product specification sheet for the FuelCell Energy's Direct Fuel Cell 300 (DFC 300) is provided as an attachment.

### **Emissions Estimation**

During normal operation, the only emissions release point of criteria pollutants and toxic air contaminants is the fuel cell exhaust stack located on the MBOP of the fuel cell skid as shown in Figure 2 – Fuel Cell Powerplant Layout. It is expected that there will be four start-ups of the fuel cell energy station in a year during which hydrogen gas will be emitted for about one hour. In addition, the venting from the PSA System will occur once a year during which mostly  $CO_2$  and  $H_2$  will be released through the Relief Vent as shown in Figure 1 - Fuel Cell Energy Station Process Flow Diagram.

### Estimated Emissions of Criteria Pollutants

The estimated criteria pollutant emissions from the Fuel Cell Energy Station are presented in Table 1 below. The emissions for the digester gas fuel cell were calculated based on the following assumptions obtained from the fuel cell specification sheet:

- Criteria Pollutant Emissions for 300 kW Natural Gas Fuel Cell

	lbs/MWh
NOx	0.01
SOx	0.0001
PM10	0.00002
VOC	0.01
CO	0.1

- Fuel Flow: 39 scfm Natural Gas; 75 scfm Digester Gas
- 558 BTU/ft<sup>3</sup>  
(BTU value of digester gas is approx 60% of natural gas ? 930 BTU/ft<sup>3</sup>)
- 7260 BTU/KWh

Table 1: Summary of Criteria Pollutant Emissions from Fuel Cell Energy Station

	Fuel - Digester Gas	
	lbs/hr	lbs/yr
NOx	0.0035	306.60
SOx	0.00003	2.63
PM10	0.000007	0.61
VOC	0.003	262.80
CO	0.035	3066.00

*typo!*  
30.6  
0.263  
0.06  
26.28  
306.6

### Estimated Emissions of Toxic Air Contaminants (TAC)

The estimated TAC emissions from the Fuel Cell Energy Station are presented in Table 2. They represent the worst case scenario in that they are emissions from 75 scfm of digester gas prior to the fuel pre-treatment (carbon adsorber) skid. They are also below the SCAQMD Rule 1401 Risk Assessment Tier 1 Screening Levels; therefore, no further health risk analysis was conducted.

**Table 2. Summary of TAC Emissions from Fuel Cell Energy Station**

Compound	Conc. (ppm)	MW	Uncontrolled Emissions		Tier I Screening Level 100 Meter	
			(lbs/yr)	(lbs/hr)	(lbs/yr)	(lbs/hr)
Benzene	0.184	78.1	1.58	1.80E-04	8.92	3.96
Carbon Disulfide	0.0025	76.1	0.02	2.38E-06	207,000	18.9
Carbon Tetrachloride	0	153.24	0	0	5.95	5.78
Chlorobenzene	0	112.56	0	0	258,000	n/a
Chloroform	0	119.38	0	0	47	0.456
1,4(p)- Dichlorobenzene	0.988	147	15.94	0.00	22.3	n/a
Ethyl Benzene	0.642	106.16	7.48	0.00	517,000	n/a
Ethylene Dichloride	0	98.96	0	0	12.4	n/a
Hydrogen Sulfide	30	34.08	112.23	1.28E-02	0.112	
Methyl Chloroform	0	133.42	0	0	258,000	182
Methylene Chloride	0.026	84.93	0.24	2.77E-05	255	37.5
MTBE	0	24.45	0	0	496	n/a
Stryene	0	104.16	0	0	233,000	56.2
Tetrachloroethylene	0.454	165.83	8.26	9.43E-04	42.5	53.5
Toulene	3.85	92.13	38.94	4.44E-03	77,500	99.1
Trichloroethylene	0.443	131.4	6.39	7.29E-04	127	n/a
Vinyl Chloride	0.103	62.5	0.71	8.07E-05	3.3	482
Vinylidene Chloride	0	96.94	0	0	n/a	n/a
Xylenes	1.308	106.16	15.24	1.74E-03	181,000	58.9



# FuelCell Energy

Ultra-Clean, Efficient, Reliable Power

## DFC300

### Key Features

- High Efficiency
- Low Environmental Impact
- Fuel Flexibility
- High Reliability
- Quiet Operation

### Advantages

The DFC®300™ stationary fuel cell power plant from FuelCell Energy provides high-quality, Ultra-Clean electrical power with 47% efficiency in a small footprint. Designed for commercial and industrial applications, the system offers 24/7 operation, easy transport, quiet and reliable operation, and easy site planning and regulatory approval.

### Performance

#### Power Output

Power @ Plant Rating	300 kW
Standard Output AC Voltage	480 V
Standard Frequency	60 Hz
Optional Output AC Voltages	460, 440, 420, 400, 380 V
Optional Output Frequency	50 Hz

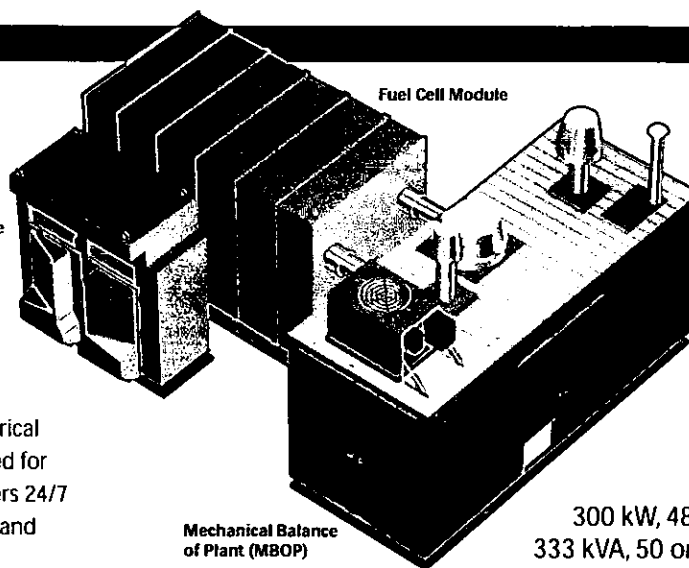
#### Efficiency

LHV	47 +/- 2 %
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#### Available Heat

Exhaust Temperature	700 +/- 50 °F
Exhaust Flow	3,950 lb/h
Allowable Backpressure	5 iwc
Heat Energy Available for Recovery (to 250°F)	480,000 Btu/h
(to 120°F)	808,000 Btu/h

Electrical Balance  
of Plant (EBOP)



Mechanical Balance  
of Plant (MBOP)

300 kW, 480 VAC,  
333 kVA, 50 or 60 Hz

#### Fuel Consumption

Natural gas (at 930 Btu/ft³)	39 scfm
Heat rate, LHV	7,260 Btu/kWh

#### Water Consumption

Average	0.9 gpm
Peak during WTS backflush	10 gpm

#### Water Discharge

Average	0.45 gpm
Peak during WTS backflush	10 gpm

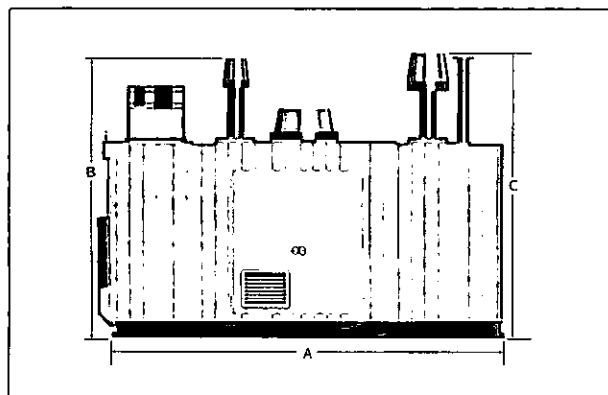
#### Pollutant Emissions

NOx	0.01 lb/MWh
SOx	0.0001 lb/MWh
PM10	0.00002 lb/MWh

#### Greenhouse Gas Emissions

CO <sub>2</sub>	980 lb/MWh
CO <sub>2</sub> (with waste heat recovery)	520-680 lb/MWh

# Specifications



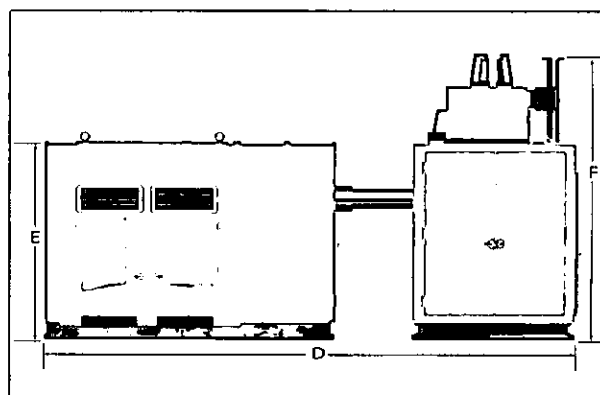
## Dimensions

### Front View

A	Overall Width	20.0 ft
B	Height of Air Intake Filter	15.1 ft
C	Height of Exhaust Stack (Required on units with no heat recovery)	14.5 ft

## Weights

Mechanical Balance of Plant	27,000 lb
Electrical Balance of Plant	15,000 lb
Fuel Cell Module	35,000 lb



## Side View

D	Overall Length	28.0 ft
E	Height of EBOP	11.8 ft
F	Height of Discharge Vent	14.5 ft

## Noise Level

Standard	72 dB(A) at 10 feet
Optional	65 dB(A) at 10 feet

## Experience & Capabilities

With more than 35 years of experience, FuelCell Energy is recognized as a world leader in the development, manufacture, and commercialization of fuel cells for stationary electric power generation. The result of years of research and the investment of more than \$530 million, our patented, carbonate Direct FuelCell products have generated more than 200 million kilowatt hours of electrical energy to date at more than 50 locations worldwide.

This brochure provides a general overview of FuelCell Energy products and services. This brochure is provided for informational purposes only. Warranties for FuelCell Energy products and services are provided only by individual sales and service contracts, and not by this brochure. This brochure is not an offer to sell any FuelCell Energy products and services. Contact FuelCell Energy for detailed product information suitable for your specific application. FuelCell Energy reserves the right to modify our products, services, and related information at any time without prior notice.

FuelCell Energy's fleet of Direct FuelCell power plants are certified to or comply with a variety of commercial and industrial standards: ANSI/CSA America FC-1, UL 1741, CARB 2007, OSHA 29 CFR Part 1910, IEEE 1547, NFPA 70, NFPA 853, and California Rule 21.

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**FuelCell Energy, Inc.**  
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Danbury, CT 06813-1305  
203 825-6000

[www.fuelcellenergy.com](http://www.fuelcellenergy.com)



**FuelCell Energy**  
Ultra-Clean, Efficient, Reliable Power

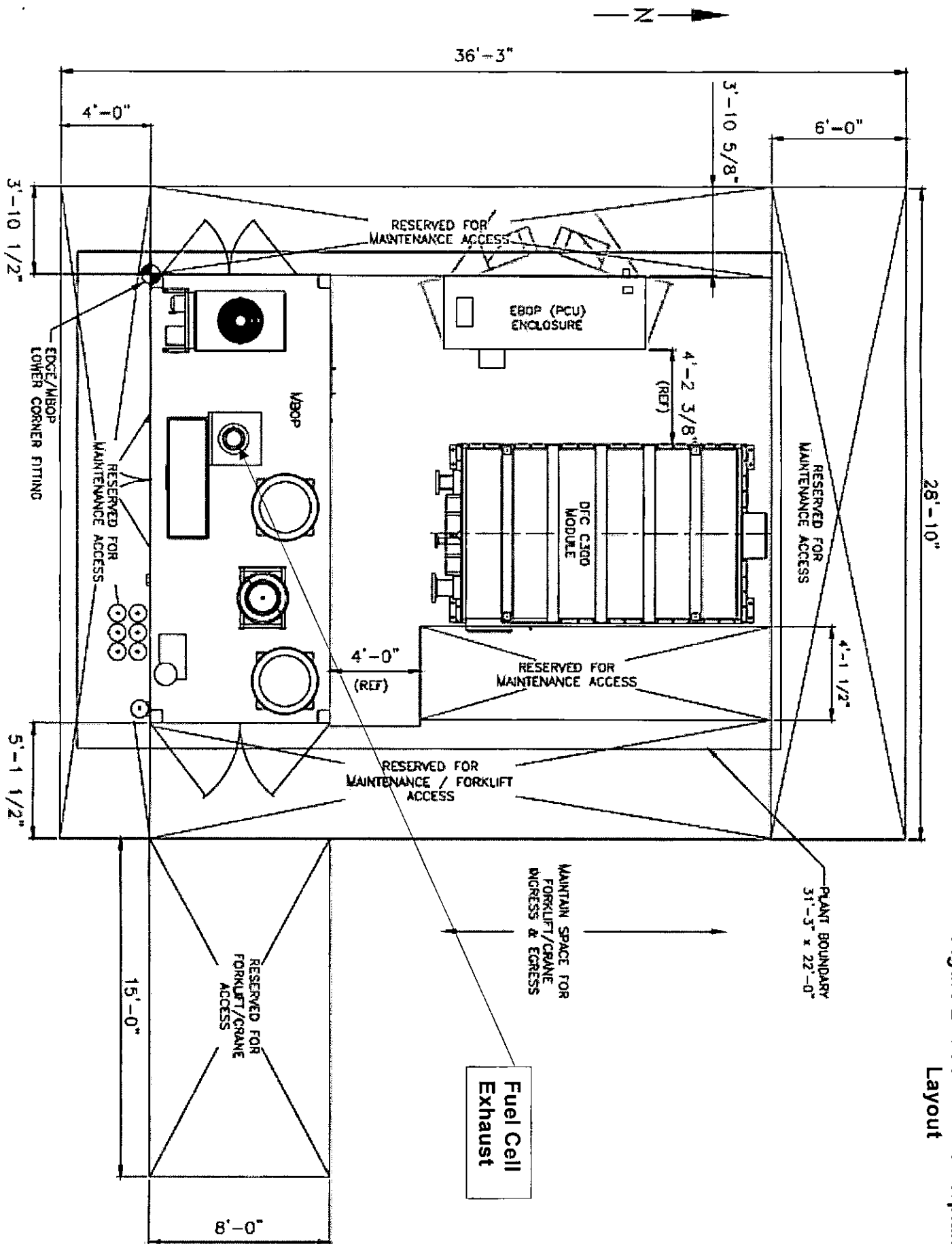


Figure 2. Fuel Cell Powerplant Layout



cyclic, branched, or linear, completely fluorinated ethers with no unsaturations

cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations

sulfur-containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.

- (30) SOURCE means any grouping of equipment or other air contaminant-emitting activities which are located on parcels of land within the District, in actual physical contact or separated solely by a public roadway or other public right-of-way, and are owned or operated by the same person or by persons under common control. Such above-described groupings, if remotely located and connected only by land carrying a pipeline, shall not be considered one stationary source. (Under RECLAIM, a SOURCE is any individual unit, piece of equipment or process which may emit an air contaminant and which is identified, or required to be identified, in the RECLAIM Facility Permit)
- (31) STREAMLINED STANDARD PERMIT means a permit issued for certain types of equipment or processes commonly permitted by AQMD with pre-set levels of controls and emissions. The operating conditions and other qualifying criteria are pre-determined by the AQMD and provided to the permit applicant in the permit application package for concurrence.
- (32) STATEWIDE EQUIPMENT is equipment with a valid registration certificate issued by CARB for the Statewide Portable Equipment Registration Program.
- (33) TEMPORARY PERMIT TO OPERATE represents interim authorization to operate equipment until the Permit to Operate is granted or denied. A temporary Permit to Operate is not issued by the District but may exist pursuant to Rule 202.

(c) Fees for Permit Processing

(1) Permit Processing Fee

(A) Permit Processing Fee Applicability

Except as otherwise provided in this rule, every applicant who files an application for a Permit to Construct, Permit to Operate, Facility Permit, court judgments in favor of the District and

administrative civil penalties or a revision to a Facility Permit, shall, at the time of filing, pay all delinquent fees associated with the facility and shall pay a permit processing fee.

- (i) Except as otherwise provided in this paragraph, the permit processing fee shall be determined in accordance with the schedules (set forth in the Summary Permit Fee Rates tables at the time the application is deemed complete.
- (ii) A person applying for permits for relocation of equipment shall pay fees in accordance with the schedules set forth in the Summary Permit Fee Rates tables at the time the application is deemed complete. All fees due, within the past 3 years, from the previous facility for equipment for which a Change of Location application is filed, and all facility-specific fees (such as "Hot Spots" fees), must be paid before the Change of Location application is accepted.
- (iii) A person applying for permits for any equipment/process not otherwise listed in Table I shall pay the fees associated with Schedule C. Prior to the issuance of a permit, these fees are subject to adjustment, as necessary.
- (iv) For applications submitted prior to July 1, 1990, the applicant shall pay a permit processing fee as specified in the Summary Permit Fee Rates tables, less any previously paid filing fees not to exceed the amount due. These fees are due and payable within thirty (30) days of receipt of notification.
- (v) In the event a Permit to Construct expires under the provisions of Rule 205, and the applicable rules, regulations, and BACT for that particular piece of equipment have not been amended since the original evaluation was performed, the permit processing fee for a subsequent application for a similar equipment shall be the fee established in the Summary Permit Fee Rates - Change of Operator table according to the applicable schedule under the Change of Operator category, provided the subsequent application is submitted within one (1) year

(2) Change of Operator/Location

If the owner/operator or the location of an emission source subject to Rule 222 changes, the current owner/operator must file a new application for Rule 222 and pay to the District an initial non-refundable non-transferable filing and processing fee of \$135.30 for FY 06-07, \$148.83 for FY 07-08 and \$163.71 for FY 08-09 for each emission source.

(3) Annual Renewal Fee

On an annual re-filing date set by the Executive Officer the owner/operator of a source subject to Rule 222 shall pay a renewal fee of 135.30 for FY 06-07, \$148.83 for FY 07-08 and \$163.71 for FY 08-09 (except for non-retrofitted boilers). At least thirty (30) days before such annual re-filing date, all owners/operators of emission sources subject to Rule 222 will be notified by either electronic or regular mail of the amount to be paid and the due date for the annual re-filing fee.

(4) Notification of Expiration

If the annual re-filing fee is not paid within thirty (30) days after the due date, the filing will expire and no longer be valid. In such case, the owner/operator will be notified by either electronic or regular mail of the expiration and the consequences of operating equipment without a valid Rule 222 filing.

(5) Reinstating Expired Filings

To re-establish expired filings, the owner/operator of a source subject to Rule 222 shall pay a reinstatement fee of fifty percent (50%) of the amount of fees due per emission source. Payment of all overdue fees shall be made in addition to the reinstatement surcharge. Payment of such fees shall be made within one year of the date of expiration. If the period of expiration has exceeded one year or the affected equipment has been altered, the owner/operator of an emission source subject to Rule 222 shall file a new application and pay all overdue fees.

(u) Fees for Expedited Processing Requests

An applicant has the option to request expedited processing for an application for a permit, CEQA work, an application for an ERC/STC, Air Dispersion Modeling, HRA, Source Test Protocols and Report Fees. A request for expedited processing pursuant to this section shall be made upon initial application submittal. Expedited processing is intended to be performed by

District Staff strictly during overtime work. Approval of such a request is contingent upon the District having necessary procedures in place to implement an expedited processing program and having available qualified staff for overtime work to perform the processing requested. The applicant shall be notified whether or not the request for expedited processing has been accepted within 30 days of submittal of the request. If the request for expedited processing is not accepted by the District, the additional fee paid for expedited processing will be refunded to the applicant.

(1) Permit Processing Fee

Fees for requested expedited processing of permit applications will be an additional fee of fifty percent (50%) of the applicable base permit processing fee (after taking any discounts for identical equipment but not the higher fee for operating without a permit) by equipment schedule. For schedule F and higher, expedited processing fees will include an additional hourly fee when the processing time exceeds times as indicated in column 1 below; but not to exceed the total amounts in column 4, based on the applicable schedule as follows:

Processing Time Exceeding	Schedule	Added Base Hourly Fee \$	Maximum Added Base Cap Fee \$
FY 06-07			
99 hours	F	\$166.24	\$31,247.52
117 hours	G	\$166.24	\$53,534.33
182 hours	H	\$166.24	\$68,068.79
FY 07-08			
99 hours	F	\$182.87	\$34,372.28
117 hours	G	\$182.87	\$58,887.76
182 hours	H	\$182.87	\$74,875.67
FY 08-09			
99 hours	F	\$201.15	\$37,809.50
117 hours	G	\$201.15	\$64,776.54
182 hours	H	\$201.15	\$82,363.24

## FY 08-09

Schedule	Permit Processing Fee	Change of Condition	Alteration/Modification
A	\$1,287.22	\$670.49	\$1,287.22
A1	\$1,287.22	\$670.49	\$1,287.22
B	\$2,051.52	\$1,016.31	\$2,051.52
B1	\$3,244.91	\$1,758.90	\$3,244.91
C	\$3,244.91	\$1,758.90	\$3,244.91
D	\$4,478.51	\$3,008.18	\$4,478.51
E	\$5,148.93	\$4,416.74	\$5,148.93
F	\$12,939.58+T&M,	\$6,448.14	\$10,257.62+T&M
G	\$15,272.72+T&M	\$10,942.07*	\$12,590.75+T&M
H	\$23,666.52+T&M	\$13,873.64*	\$20,984.56+T&M

F: T&M = Time and Material charged at \$134.10 per hour above 99hours; not to exceed \$25,206.34

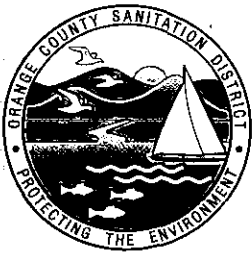
G: T&M = Time and Material charged at \$134.10 per hour above 117hours; not to exceed \$43,184.35

H: T&M = Time and Material charged at \$134.10 per hour above 182hours; not to exceed \$54,908.82

\* Correction: revised fees correct a typographical error to reflect the actual Board approved 10% fee increase for FY 08-09

**SUMMARY OF ERC PROCESSING RATES, BANKING, CHANGE OF TITLE,  
ALTERATION/MODIFICATION, and CONVERSION TO SHORT TERM  
CREDITS**

Schedule	Banking Application	Change of Title	Alteration/Modification	Conversion to Short Term Credits	Re-issuance of Short Term Credits
FY 06-07 I	\$2745.06	\$484.90	\$484.90	\$484.90	\$484.90
FY 07-08 I	\$3,019.57	\$533.39	\$533.39	\$533.39	\$533.39
FY 08-09 I	\$3,321.52	\$586.73	\$586.73	\$586.73	\$586.73



# ORANGE COUNTY SANITATION DISTRICT

October 23, 2008

10844 Ellis Avenue  
Fountain Valley, CA  
92708-7018

**Mailing Address**  
P.O. Box 8127  
Fountain Valley, CA  
92728-8127

[www.ocsd.com](http://www.ocsd.com)

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Santa Ana

Seal Beach

Stanton

Tustin

Villa Park

Yorba Linda

Costa Mesa  
Sanitary District

Midway City  
Sanitary District

Irvine Ranch  
Water District

County of Orange

**Permit Services**

South Coast Air Quality Management District

21865 E. Copley Drive

Diamond Bar, CA 91765-4182

**Subject:** Experimental Research Permit Application to Install Fuel Cell  
Energy Station at OCSD's Plant No. 1 (OCSD Job NO. SP-134)

The purpose of this letter is to submit an experimental research permit application for installation of temporary Fuel Cell Energy Station at Orange County Sanitation District's Wastewater Treatment Plant No. 1.

The proposed temporary Fuel Cell Energy Station will consist of the fuel cell system and the hydrogen recovery unit. The fuel cell will primarily be fueled with digester gas from the Plant No. 1's anaerobic digestion process to create electricity and excess Hydrogen (H<sub>2</sub>) gas will be routed to the onsite hydrogen car fueling station. Once the installation is completed, the Fuel Cell Energy Station will be operated for a demonstration period of six months to one year.

Enclosed with this letter are:

- (1) SCAQMD Form 400-A
- (1) SCAQMD Form 400-CEQA with Notice of Exemption
- (1) SCAQMD Form 400-PS
- (1) SCAQMD Form 400-XPP
- Supplemental Information
- Check for the permit processing fee in the amount of \$4,867.37

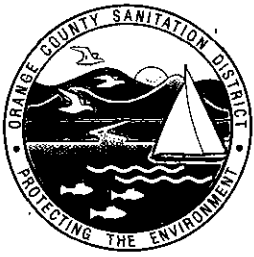
If you have any questions or require further information, please contact Terry Ahn at (714) 593-7082 or [tahn@ocsd.com](mailto:tahn@ocsd.com).

Michael D. Moore

Manager

MM/TA/jb

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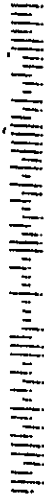
Permit Services  
Page 2  
October 23, 2008

Enclosure(s)

c: V. Kogan  
Charlie Tupac (SCAQMD)  
Gaurang Rawal (SCAQMD)

**ORANGE COUNTY  
SANITATION DISTRICT**

POST OFFICE BOX 8127  
FOUNTAIN VALLEY, CA 92728-8127  
[WWW.OCSD.COM](http://WWW.OCSD.COM)



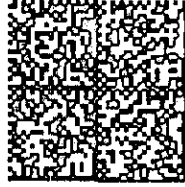
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10/29/2008

Mailed From 92708  
US POSTAGE

Hasler



SCAQMD  
P.O. Box 4944  
Diamond Bar, CA 91765



ORANGE COUNTY  
SANITATION DISTRICT

10844 Ellis Avenue, P.O. Box 8127  
Fountain Valley, CA 92728-8127  
(714) 962-2411

VENDOR NO. 83926

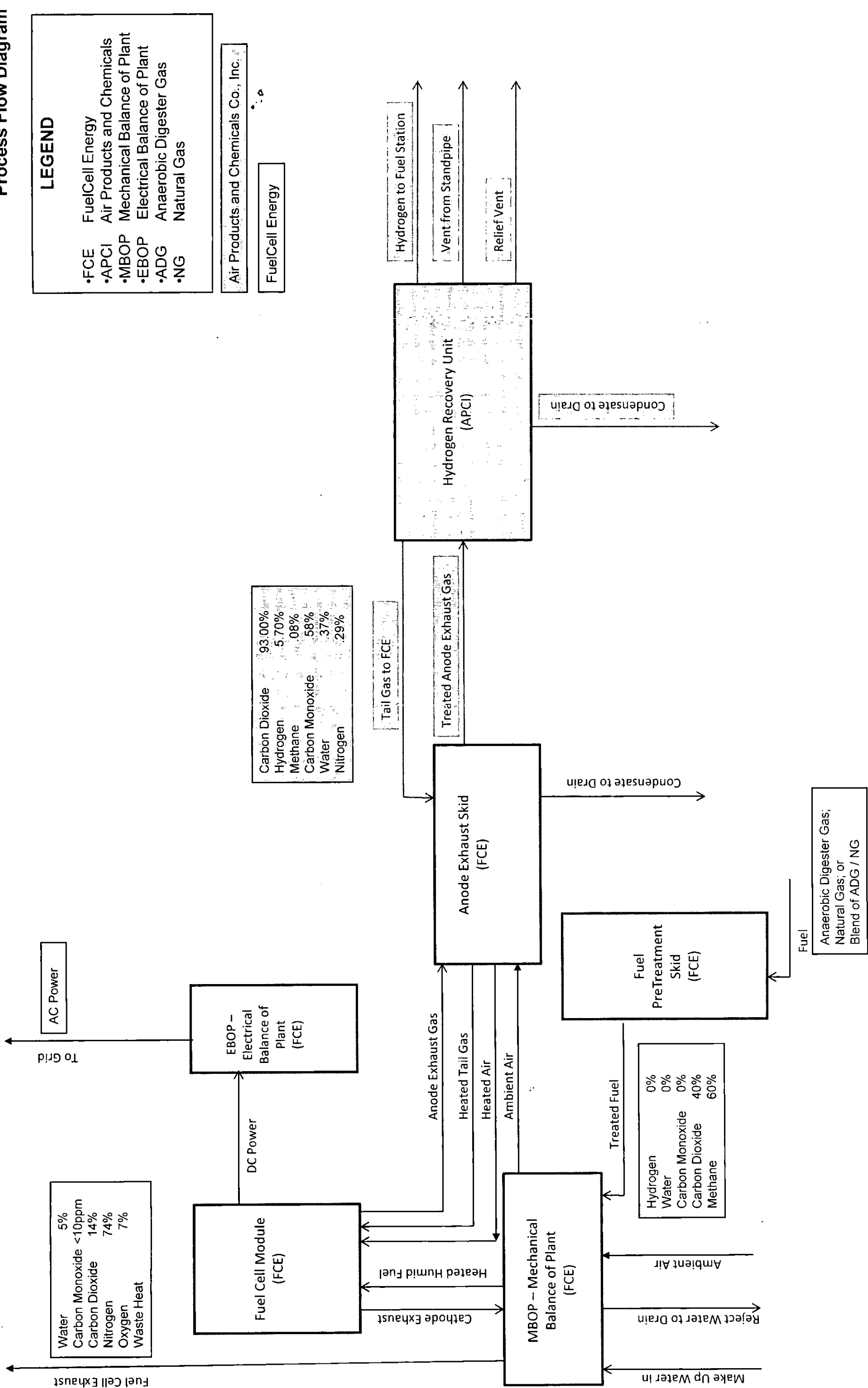
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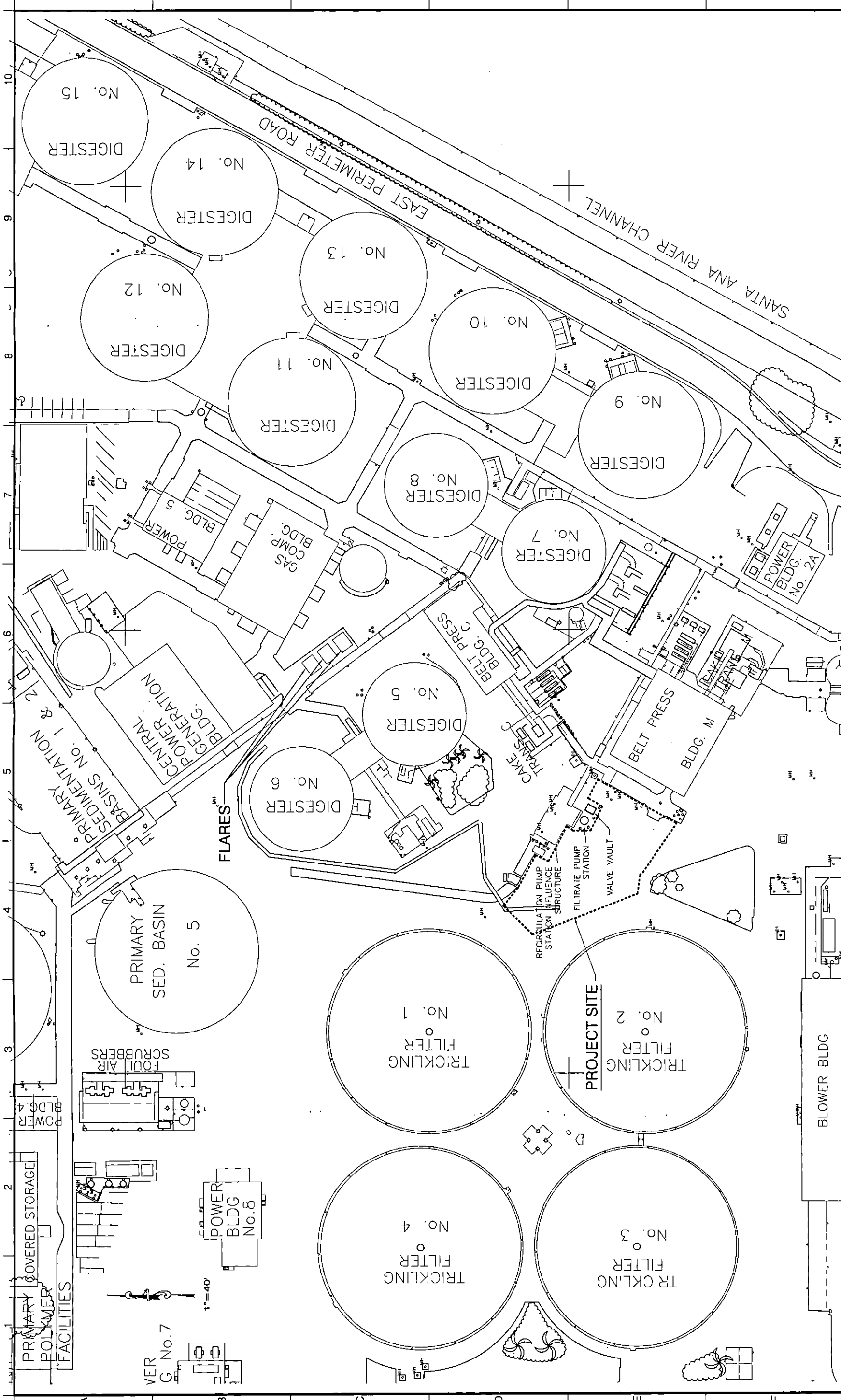
CHECK NO. 1000015703

VENDOR NAME SOUTH COAST AQMD

INVOICE NO.	INVOICE DATE	DESCRIPTION	GROSS AMOUNT	DISC - ADJ.	PAYMENT AMOUNT
PERMIT FEE - SP-134	10/23/08	Job# SP-134	4,867.37		4,867.37
			AMOUNT - U.S. DOLLARS	\$*****4,867.37	

Figure 1. Fuel Cell Energy Station  
Process Flow Diagram





PROJECT NO. SP-134

DRAWING NO. G0003

3 OF 3

FUEL CELL HYDROGEN  
GAS GENERATION RESEARCH

PROJECT SITE PLAN

ORANGE COUNTY  
SANITATION DISTRICT

DESIGNED BY: JMS - 10/08

DRAWN BY: JLT - 10/08

CHECKED BY: CM - 10/08

LINE IS 2 INCHES  
AT FULL SIZE  
(IF NOT 2" SCALE ACCORDINGLY)

MARK	APPLIED FOR PERMIT	DATE APPR.	DESCRIPTION
A	10/08 CM		